

Analysis of XYZ's Health Product Communication Strategy in Fulfilling the Elements of the Pharmaceutical Industry Code of Conduct

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KEYWORDS	ABSTRACT
Communication Strategy; Health Products; Pharmaceutical Industry; Code; Corporate Communications; Gray Region Compliance; Glocal; Ethical Narratives; IPMG	This study aims to analyze the health product communication strategy implemented by Company XYZ in complying with the pharmaceutical industry's code of conduct in Indonesia. As a member of the International Pharmaceutical Manufacturers Group (IPMG), Company XYZ faces challenges in delivering ethical product messages amid strict regulations from the Indonesian Food and Drug Authority (BPOM) and IPMG's code of ethics, which prohibits direct-to-public promotion. This research employs a qualitative approach using a descriptive case study method, involving in-depth interviews, document analysis, and observation. The findings reveal that Company XYZ applies an adaptive and ethical communication strategy through narrative approaches, selective media mapping, and active engagement in industry associations. The strategy reflects a glocal approach, where global communication policies are adjusted to local contexts. Another key finding is the practice of grey area compliance, where communication strategies technically do not violate regulations but still convey product messages implicitly. While this demonstrates the communication team's ingenuity in navigating regulatory boundaries, it also poses potential risks of unethical communication if not properly managed. This study proposes the development of a more contextual, strategic, and regulation-compliant health product communication model, adapted from the corporate communication framework introduced by Nurlaela Arief. This model is expected to serve as a reference for communication practices in the complex and dynamic pharmaceutical industry.

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INTRODUCTION

Health communication is a strategic element in the pharmaceutical industry, especially in building public awareness of the safe, appropriate, and responsible use of drugs. In Indonesia, the communication of health products is strictly regulated by various regulations, such as Law Number 36 of 2009 concerning Health, Government Regulation Number 72 of 1998 concerning the Security of Pharmaceutical Preparations and Medical Devices, as well as guidelines from the Food and Drug Supervisory Agency (BPOM). In addition, pharmaceutical companies that are members of

associations such as the International Pharmaceutical Manufacturers Group (IPMG) are also required to comply with industry codes of ethics that prohibit the direct promotion of ethical products to the general public.

Company XYZ, as a member of IPMG and part of a network of multinational pharmaceutical companies, faces the complex challenge of conveying ethical product information, i.e. products that can only be used based on prescriptions and supervision of health workers. These limitations require companies to design communication strategies that are not only compliant with regulations, but also able to reach stakeholders effectively. In this context, narrative approaches, selective media utilization, and corporate image strengthening are the main instruments in conveying messages implicit but still meaningful.

The main challenge in communicating ethical products lies in the limited communication space that is legally allowed. Information regarding trade names, composition, benefits, and product claims cannot be publicly disclosed. This requires communication practitioners to craft thoughtful, creative, and strategic messages in order to build awareness and trust without violating regulatory boundaries. Carelessness in conveying information can pose legal risks, reputational crises, and potential ethical violations that have an impact on business continuity.

Within the framework of corporate communication theory, Arief (2020) emphasizes the importance of transparency, consistency, and relevance of messages in building public reputation and trust. Effective corporate communication not only conveys information, but also shapes the perception and legitimacy of the company in the eyes of stakeholders. Meanwhile, the theory of health communication according to Putri, Nugraheni, and Mukhtar (2021) highlights the importance of a holistic and integrated approach in conveying health information, including the use of digital and interpersonal media to reach a wider and more diverse audience.

The urgency of this research lies in the need to understand how pharmaceutical companies can continue to carry out their communication functions strategically in the midst of strict regulatory limitations. Amid increasing demands for public transparency and oversight of the healthcare industry, companies are required to not only comply with the law, but also be able to build trust through ethical and effective communication. This research is important because it provides an empirical picture of how communication strategies can be designed to remain relevant, adaptive, and impactful, without violating applicable legal restrictions. In addition, the study also makes a practical contribution to other pharmaceutical companies in designing contextual and sustainable communication strategies.

This study aims to analyze the health product communication strategy implemented by Company XYZ in the launch of locally produced paracetamol products in October 2024. This study uses a qualitative approach with a descriptive case study method to explore how companies structure messages, choose media, determine target audiences, and manage compliance with industry regulations and codes of conduct. This study also examines the strategic role of the corporate communications team as a compliance custodian and a key actor in building ethical, adaptive, and contextual narratives in the highly regulated pharmaceutical industry.

MATERIALS AND METHODS

This study uses a qualitative approach with a descriptive case study method to understand in depth the communication strategy of health products implemented by Company XYZ in the launch of locally produced paracetamol products. This approach was chosen because it allows researchers to explore communication phenomena in a real context, taking into account the regulatory complexities and dynamics of the highly regulated pharmaceutical industry. Descriptive

case studies are considered appropriate to describe in detail the communication practices carried out by companies in specific situations that cannot be reduced to quantitative variables (Yin, 2018).

The object of this research is the external communication strategy carried out by Company XYZ, particularly in the context of launching ethical products produced locally. The research subjects consist of key informants who have a strategic role in the planning and implementation of product communication, including Assistant Manager of Corporate Communication, Director of Government Affairs, Market Access, Regulatory, Quality Assurance and Medical Science Affair (GAMARA-QA & MSA), Product Manager for pharmaceutical products, and Executive Director of IPMG as a triangulator.

Data collection was carried out through in-depth interviews, documentation studies, and participatory observations. The interviews were conducted in a semi-structured manner to gather information from key informants regarding communication strategies, regulatory compliance, as well as the process of preparing messages and selecting media. The documentation study includes an analysis of press releases, internal communication materials, media reports, and relevant regulatory documents. Observations are carried out directly by researchers who are also involved in the corporate communication process, thus allowing participatory observation of the process of planning and implementing communication strategies.

The data obtained was analyzed using a thematic analysis approach as developed by Miles and Huberman (2020). The analysis process includes data reduction, data presentation, and conclusion drawn. Data reduction is carried out by grouping information based on key themes such as communication narratives, regulatory compliance, media selection, and stakeholder engagement. The presentation of data is carried out in the form of an in-depth descriptive narrative, while the drawing of conclusions is inductive based on the patterns that emerge from the data.

To improve the validity and reliability of the data, this study uses source and method triangulation techniques. Triangulation was carried out by comparing the results of interviews from various informants, direct observations, and supporting documents. In addition, the triangulator involvement of IPMG provides an independent perspective on the communication strategy implemented by Company XYZ, particularly in terms of compliance with the pharmaceutical industry's code of conduct.

RESULTS AND DISCUSSIONS

Health Product Communication Strategy Planning

Communication planning is the main foundation in the communication strategy carried out by XYZ Company. In the context of launching locally produced paracetamol products, this planning not only includes technical aspects, but also considers ethical and regulatory dimensions. According to Arief (2020), communication planning must be carried out systematically, starting from analyzing the situation, determining communication goals, identifying audiences, to selecting the right media. XYZ Company applies this principle by mapping market conditions, BPOM regulations, and expectations from key stakeholders.

The main objective of this communication strategy is to build public perception that XYZ Company has carried out local production in accordance with TKDN policy and still maintains global quality standards. In the process, the communications team works closely with the product team and the regulatory team to ensure that each message compiled has gone through an internal

validation process. This is important to maintain consistency and compliance with applicable regulations, both in terms of law and ethics in the pharmaceutical industry.

Communication planning also involves the integration of global and local strategies. As part of a network of multinational companies, Company XYZ must adapt its global communication strategy to the local Indonesian context. This glocal approach allows companies to maintain global message alignment while remaining relevant to local cultures and regulations. In practice, local teams have the flexibility to adjust narratives and communication channels to suit the needs of the Indonesian market.

With careful planning, Company XYZ is able to anticipate challenges that may arise during the communication process. This includes potential resistance from regulators, public misunderstandings, and the risk of code of ethics violations. Therefore, the communication strategy designed is not only reactive, but also proactive and preventive, taking into account the various scenarios that may occur on the ground.

Crafting the Main Message and Ethical Narrative

The main message in Company XYZ's communication strategy is designed to convey the company's values implicitly, without violating applicable regulatory constraints. In the context of the launch of locally produced paracetamol products, the main message raised is the company's commitment to domestic production, environmental sustainability, and packaging innovation. This message does not mention the name of the product directly, but it is still able to build a positive perception among stakeholders. This strategy is in line with the principles of corporate communication which emphasizes the importance of consistency and relevance of messages (Arief, 2020).

The narrative built by the communication team is not only informative, but also persuasive and symbolic. This narrative raises the theme of sustainability and contribution to the national health system, which is packaged in the form of press releases, visual documentation, and support for scientific activities. With this approach, companies are able to convey a strong message without violating the prohibition of direct promotion of ethical products. This narrative approach also reinforces the company's image as a responsible and innovative entity.

In crafting the narrative, the communication team also considers the emotional and rational aspects of the audience. The narrative conveyed focuses not only on the advantages of the product, but also on the social value and positive impact it produces. This is important for building an emotional connection with your audience and increasing brand loyalty. According to Cornelissen (2020), an effective narrative must be able to connect the company's values with the needs and expectations of the audience.

This key messaging strategy also shows the company's ability to manage communications in the gray area compliance. By not explicitly mentioning the name of the product, but still conveying a meaningful message, the company succeeds in maintaining compliance with regulations while achieving communication goals. However, this strategy still requires strict ethical supervision so as not to cause misinformation or misleading perceptions (Wijaya, 2021).

Audience Segmentation and Communication Target Determination

Audience segmentation is a strategic step taken by Company XYZ to ensure that the message conveyed is on target. In the context of ethical product launches, the main targeted audiences include healthcare workers, hospital management, regulators, and professional associations. This segmentation is carried out based on an analysis of information needs, roles in decision-making, and potential influence on public perception. With this approach, companies can craft more relevant and effective messages.

Each audience segment has different communication characteristics and preferences. Therefore, the XYZ Company adjusts the language style, message format, and communication channels used. For example, for professional audiences such as doctors and pharmacists, companies use an educational and data-driven approach. As for regulators, the company emphasizes compliance with regulations and contributions to national policies. This approach is in line with health communication theory that emphasizes the importance of understanding audience characteristics (Putri et al., 2021).

Audience segmentation also allows companies to better manage communication risks. By knowing who the recipient of the message is, companies can anticipate potential misinterpretations and adjust the message so as not to cause controversy. In addition, this segmentation also helps companies in allocating communication resources more efficiently, focusing on audiences that have a strategic influence on the success of the product.

In practice, audience segmentation is carried out dynamically and continuously. The communication team routinely evaluates the effectiveness of messages and audience responses, and makes strategic adjustments if necessary. With this approach, companies can maintain the relevance of messages and improve communication effectiveness in the long run.

Media and Communication Channel Selection

Media selection is an important aspect of Company XYZ's communication strategy. In launching locally produced paracetamol products, the company uses a combination of digital and print media to reach a wider audience. Digital media such as health news portals and social media are used to convey messages quickly and interactively, while print media are used to reach professional and institutional audiences. This strategy reflects the company's understanding of the media characteristics and preferences of each audience segment.

The media used by Company XYZ is classified into several tiers based on their reach and influence. Tier one media includes national media with high credibility health and business rubrics. Tier two and three media include local and community media that are used to reinforce messages at the regional level. This approach allows companies to convey messages that are consistent but tailored to the local context, in accordance with the principles of glocal communication (Arief, 2020).

In addition to mass media, XYZ Company also utilizes direct communication channels such as scientific seminars, health worker training, and participation in professional association

activities. These channels are used to build more personal and deep relationships with key audiences. In the context of ethical product communication, this approach is particularly effective because it allows for the delivery of more detailed information and in accordance with the professional needs of the audience.

The selection of media also considers regulatory and ethical aspects. The company ensures that the media used does not violate the provisions of ethical product promotion, such as the prohibition of mentioning product names directly to the public. Therefore, the message conveyed through the media is packaged in the form of a corporate and educational narrative that remains in the regulatory corridor. This approach shows that media selection is not only about reach, but also about compliance and responsibility.

Compliance with Regulations and Code of Conduct

Compliance with regulations and codes of conduct is a key principle in XYZ Company's communication strategy. As a member of IPMG, companies are required to comply with a code of ethics that prohibits the direct promotion of ethical products to the public. In addition, the company is also subject to BPOM regulations that regulate the communication limits of pharmaceutical products. In this context, any communication material prepared must go through an internal validation process to ensure compliance with applicable regulations.

The practice of *grey area compliance* is one of the strategies used by companies to convey messages implicitly without violating regulations. For example, in the press release of the launch of the paracetamol product, the company did not mention the name of the product directly, but emphasized on aspects of local production and packaging innovation. This strategy allows companies to still deliver meaningful messages without violating legal restrictions. However, this strategy also requires strict ethical supervision so as not to cause misinformation (Wijaya, 2021).

The communication team acts as a compliance guardian who is responsible for ensuring that all communication activities run in accordance with regulations and codes of ethics. This function includes the preparation of communication SOPs, internal training, and coordination with the regulatory and legal teams. With this approach, companies can minimize the legal and reputational risks that may arise from a communication breach.

Compliance with regulations is also part of the company's commitment to *good corporate governance*. In the highly regulated pharmaceutical industry, compliance is not only a legal obligation, but also a form of corporate social responsibility. Therefore, the communication strategy executed by the XYZ Company is not only oriented towards the effectiveness of the message, but also on integrity and ethics.

Integration of Internal Communication and Employee Training

XYZ Company realizes that the success of a communication strategy depends not only on external messages, but also on a strong internal understanding. Therefore, the company integrates all major communication and messaging channels into the internal communication system. This is done to ensure that all employees, especially those on the front lines such as sales teams and

external relations, understand well the ethical product communication limits and the values that the company wants to convey.

One of the concrete steps taken is the preparation of a Communication Standard Operating Procedure (SOP) which includes guidelines for compliance with regulations and codes of ethics. This SOP is a reference for all work units in compiling and conveying communication messages, both to business partners and to the public. With clear SOPs, companies can minimize the risk of communication violations that can have an impact on the company's reputation and legality.

In addition, the company also routinely conducts internal training to refresh employees' understanding of BPOM regulations, IPMG code of ethics, and company communication policies. The training is not only informative, but also applicative, with case studies and relevant communication simulations. According to Arief (2020), effective internal communication training can improve message alignment and strengthen an organizational culture that is compliant and ethical.

With this approach, XYZ Company not only builds effective communication to the outside, but also creates a solid internal communication ecosystem. This is important to maintain message consistency, avoid communication crises, and build public trust in an ongoing manner.

Glocal's Approach in Communication Strategy

As part of a network of multinational companies, XYZ Company applies a glocal approach in its communication strategy. This approach combines strategic direction from the global headquarters with local adaptations tailored to the cultural, social, and regulatory context in Indonesia. In practice, local communications teams have the flexibility to tailor messages and communication channels to stay relevant and effective in the domestic market.

This glocal approach is evident in the launch of locally produced paracetamol products, where a global message of innovation and sustainability is packaged in a local narrative that emphasizes support for TKDN policies and contributions to the national health system. This shows that companies are able to translate global strategies into local contexts without losing the essence of the message they want to convey.

According to Cornelissen (2020), an effective communication strategy in multinational organizations must be able to bridge cultural and regulatory differences between countries. In this context, Company XYZ has demonstrated high adaptability, while maintaining brand consistency and corporate values globally. This approach also strengthens the company's position as an entity responsive to local dynamics.

With the glocal strategy, XYZ Company has not only succeeded in building compliant and effective communication, but also strengthened its social legitimacy in Indonesia. This is an important competitive advantage in a highly regulated and sensitive pharmaceutical industry to public perception.

Involvement in Associations and Policy Advocacy

XYZ's company demonstrates active involvement in industry associations, particularly the International Pharmaceutical Manufacturers Group (IPMG), as part of its external communication and policy advocacy strategy. Membership in IPMG gives companies access to the latest regulatory information, policy discussion forums, and opportunities to voice industry interests collectively. In the context of the launch of locally produced paracetamol products, this engagement is important to ensure that the communication strategy is implemented within the applicable ethical and legal corridors.

Through IPMG, XYZ Company can participate in the drafting and revision of the pharmaceutical industry's code of conduct. This allows companies to provide input based on practical experience in the field, as well as adapt communication strategies to evolving regulatory dynamics. According to Arief (2020), involvement in industry associations is a form of strategic communication that not only builds reputation, but also strengthens the company's bargaining position in the public policy ecosystem.

This engagement also reflects the company's commitment to ethical and collaborative business practices. By supporting association activities such as seminars, trainings, and policy forums, the company not only expands its communication network, but also strengthens relationships with regulators and other stakeholders. This is important for building trust and social legitimacy, especially in highly regulated industries such as pharmaceuticals.

Strategically, policy advocacy through associations also helps companies anticipate regulatory changes and adjust communication strategies proactively. Thus, engagement in associations is not just a symbolic activity, but an integral part of a corporate communication strategy oriented towards sustainability and compliance.

Evaluation of Communication Effectiveness

Evaluation is an important stage in a communication strategy to measure the extent to which the message conveyed achieves the set goals. In the case of Company XYZ, the evaluation is carried out through an analysis of the PR value and news value of the published press release. The results of the evaluation showed that the message conveyed managed to gain wide exposure in the media without causing regulatory violations, demonstrating the effectiveness of the narrative approach and the right media selection.

However, evaluation does not stop at the quantitative aspect. Companies also need to conduct a qualitative evaluation of public perception, audience understanding of the message, and its impact on reputation and trust. This evaluation can be done through surveys, in-depth interviews, or social media analysis. According to Cornelissen (2020), a comprehensive communication evaluation must include the dimensions of output, outcomes, and impact.

In practice, Company XYZ still faces challenges in measuring the long-term impact of communication strategies on audience behavior and purchasing decisions. Therefore, companies need to develop a more structured and sustainable evaluation system, including indicators relevant to communication and regulatory compliance objectives.

With the right evaluation, companies can identify the strengths and weaknesses of the communication strategy that has been implemented, as well as make improvements for the next strategy. Evaluation is also the basis for more accurate and data-driven decision-making in corporate communication management.

Strategic and Ethical Implications

The communication strategy implemented by the XYZ Company has significant strategic implications for reputation, business sustainability, and relationships with stakeholders. By prioritizing a narrative approach, audience segmentation, and selective media selection, companies are able to convey strong and meaningful messages without violating regulations. This strategy not only increases public awareness of the product, but also strengthens the company's image as a compliant, innovative, and responsible entity.

However, this strategy also carries ethical implications that need to be managed carefully. The practice of grey area compliance, while effective in communication, has the potential to create manipulative perceptions if not ethically controlled. Therefore, companies need to ensure that every message conveyed remains transparent, accurate, and not misleading. This is important to maintain public trust and avoid reputational risks that can harm the company in the long term (Wijaya, 2021).

Another implication is the need to strengthen internal capacity in managing complex and sensitive communications. Communication teams must be equipped with a deep understanding of regulations, ethics, and industry dynamics, as well as the ability to design adaptive and contextual communication strategies. Training, SOPs, and internal oversight systems are important instruments to ensure that the communication carried out truly reflects the company's values and commitments.

Overall, the health product communication strategy implemented by XYZ Company shows that communication is not only a promotional tool, but also a strategic instrument to build business legitimacy, trust, and sustainability. With the right approach, companies can make communication a key force in facing regulatory challenges and the evolving dynamics of the pharmaceutical industry.

Conclusion

This study analyzes Company XYZ's health product communication strategy in launching locally produced paracetamol, highlighting its adaptive, ethical, and strategic approach that complies with the pharmaceutical industry's code of conduct. The company effectively integrates regulatory compliance with corporate communication goals by crafting implicit, narrative-based messages that emphasize sustainability, innovation, and national industry independence, while skillfully navigating regulatory grey areas without violating ethical standards. The research underscores the critical role of the communication team as both compliance guardians and strategic actors, combining global direction with local sensitivity to build legitimacy, trust, and reputation in a highly regulated environment. As a theoretical and practical contribution, the study offers a contextual model for corporate communication in the pharmaceutical sector, serving as a reference for other companies aiming to balance business objectives with ethical and legal requirements. For future research, it is suggested to explore the long-term impact of such communication strategies

on public trust and stakeholder relationships, as well as to examine the effectiveness of internal compliance training in preventing ethical lapses.

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