Case/1097/09/26 ***ABRIDGED PROCEDURE***

COMPLAINANT V GILEAD SCIENCES LTD

Promotion of Biktarvy (bictegravir/emtricitabine/tenofovir alafenamide) to the public on LinkedIn

This case related to a LinkedIn comment made by a senior UK employee of Gilead UK. The complainant alleged that the employee commented on a LinkedIn post that included the brand name of a Gilead medicine for HIV and that the employee's followers would include members of the public.

The complainant was non-contactable and described themselves as a member of the public.

The case preparation manager considered that the complaint met the criteria for the abridged complaints procedure because:

- it was likely in their view that there had been a breach of the Code,
- it appeared that the central facts would not be disputed, and
- the allegation fell within the PMCPA's approved list for use of the abridged procedure.

The LinkedIn post was made by a health professional. Gilead submitted that the health professional had attended a meeting in Australia, organised by the Australian Gilead affiliate, at which the Gilead UK employee who commented on the post was a speaker.

The LinkedIn post included an image of a slide shown at an event, which included the Biktarvy brand logo and the title "Unlocking equitable HIV care: removing barriers, optimising outcomes". The Gilead UK employee's comment did not, itself, refer to a Gilead medicine.

The case preparation manager considered that, by commenting on the LinkedIn post, the senior UK employee of Gilead UK had proactively disseminated the post to their LinkedIn connections, which likely included members of the public. As the post included the Biktarvy brand name, non-proprietary name and reference to HIV care, the case preparation manager considered this action to constitute promotion of Biktarvy to the public.

Gilead accepted a breach of Clause 26.1 of the Code and provided the required undertaking and assurances. Gilead confirmed that the employee deleted the comment on the LinkedIn post within two working days of receiving the complaint, and the employee had been reminded of Gilead's social media guidance.

The outcome under the 2024 Code of Practice was:

Breach of Clause 26.1	**Advertising a prescription only medicine to the public**

Complaint received **12 September 2026**

Case completed **12 October 2026**