

Table 4: RPM cases (2018 to Q1 2025)

Cases	RPM restrictions	Rejected justifications	Fines imposed
Yangtze River Pharma RPM case ¹⁵	<p>Nationwide RPM scheme across various drugs for five years through:</p> <ul style="list-style-type: none"> (i) Written agreements with downstream distributors and pharmacies, (ii) Nationwide sales network pricing control and internal pricing committee, (iii) Price adjustment notices, (iv) Verbal communications and (v) Monitoring and penalty scheme 	<p>Proposed justifications to improve qualities or develop products rejected as</p> <ul style="list-style-type: none"> (i) RPM restrictions lasted for five years (not a short-term measure); (ii) No material proof that RPM benefits were used to improve distribution channel 	<p>3% of 2018 annual sales, totaling RMB 764 million</p>
Hainan Yishun Pharma RPM case ¹⁶	<p>Nationwide RPM restrictions on Lianzhixiaoyan drops:</p> <p>Fixed retail prices via agreements with banning active and passive online sales, cross-sales between distributors and penalty schemes.</p> <p>However, distributors didn't actually implement these restrictions</p>	N/A	<p>RMB 200,000</p> <p>Fine reduced due to lack of implementation and the party's active cooperation.</p>
Zizhu Pharma RPM case ¹⁷	<p>Nationwide RPM on levonorgestrel tablets for seven years:</p> <ul style="list-style-type: none"> (i) Written agreements with distributors (ii) Price adjustment or fixing notice (iii) Third-party monitoring prices and incentive and penalty schemes 	<p>Claims of no anti-competitive effects and consumer harms rejected as no supporting evidence provided.</p>	<p>2% of 2020 annual sales, totaling RMB 12.6 million</p>

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[Pharmaceutical sector in focus: Decoding recent antitrust enforcement – Part 2 of 3](#)