Pfizer 2025

Methodology Note Supporting the Disclosure Report for Transfers of Value in 2024

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1. Introduction – Pfizer's Commitment to Transparency Reporting

We regularly work with healthcare professionals (HCPs) and healthcare organisations (HCOs) who advise us on a range of topics such as medicines development, the role of a medicine in a patient treatment pathway, health economics and clinical best practice. These working relationships are essential to gaining the real-world information we need in order to deliver treatment choices that improve the health of patients and to share information that may be relevant to clinical decision making.

We are committed to transparency about how we operate as a business and about the relationships we have with HCPs and HCOs. Sharing information about these relationships in a straightforward and open way will, we hope, help explain the critical value these relationships bring to patient management.

We believe that transparency is essential to building and maintaining confidence in us and in our medicines and strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) to improve transparency across the pharmaceutical industry.

This methodological note presents how the transfers of value are categorized and in what format they are disclosed.

2. Transfer of Value Categories

The following table defines what transfers of value are reported in which EFPIA category and subcategory.

EFPIA category	EFPIA subcategory	Example Activities
Donations and Grants (HCOs only)	n/a	• Charitable contributions • Business Donations • Educational grants (e.g., fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating) • Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program • Funding an event in return for a display booth

		• Funding an event in exchange for advertising space • Other advertisement space (in paper, electronic or another format) • Satellite symposia at a congress • If part of a package: Name badges, drinks, meals etc. provided by the organisers (included in the sponsorship agreement) • Any other activity qualified as "Corporate Sponsorship" according to Pfizer's Anti-Corruption Policies • Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as "Corporate Sponsorship" according to Pfizer's Anti-Corruption Policies • For contributions provided to Events through Professional Conference Organisers(PCOs): TOVs through PCOs are reported as follows: either in the name of benefitting HCO or in the name of Recipient PCO • Collaborative agreements
	Registration fees	• Registration fees paid for the HCP/HCO to attend events
	Travel & Accommodation	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) • Accommodation • Travel Visa
Fee for services and consultancy	Fees	• Speaker engagements • Advisory Boards* • Study-related engagements • Preceptorships • Post-marketing surveillance studies • Non-Interventional Studies that are Retrospective in nature • Medical writing • Data analysis • Development of education materials • General consulting / advising • Speaker training if linked to a speaker engagement

		• Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies
	Related expenses	• Travel (e.g., flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Travel Visa
Research and Development Transfers of Value	n/a	• Clinical Trials • Data Monitoring Committees related to studies • Non-Interventional Studies that are Prospective in nature • Investigators Initiated Research (IIR) • Investigator Sponsored Research (ISR) • Clinical & Research Collaboration

* excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&D

3. Definitions

Healthcare Professional (HCP): any natural person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is in Europe. The definition of HCPs includes: (i) any official or employee of a government, agency, or other organisation (whether in the public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products and (ii) any employee of a Member Company whose primary occupation is that of a practising HCP.

Healthcare Organization (HCO): any legal person/entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services

Covered Recipient: any reportable HCP or HCO

Patient Organisation/Patient Advocacy Group (**PO/PAG)**: a non-for-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or

caregivers, that represents and/or supports the needs of patients and/or caregivers and which business address, place of incorporation or primary place of operation is in Europe.

Research and Development (R&D): Transfers of Value to HCPs or HCOs related to the planning or conduct of (i) non-clinical studies (as defined in OECD Principles on Good Laboratory Practice); (ii) clinical trials (as defined in Regulation 536/2014); or (iii) NIS that are prospective in nature and that involve the collection of patient data from or on behalf of individual, or groups of, HCPs specifically for the study

Transfer of Value (TOV): direct and indirect TOV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription only medicine exclusively for human use. Direct TOVs are those made directly by a Member Company for the benefit of a Recipient. Indirect TOVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value

4. Scope of Disclosure

This report includes transfers of value processed by Pfizer Hellas legal entities during the reporting period for 2024.

Timing of TOV: the disclosure report includes transactions which have a reportable date within the reporting period being disclosed.

Reportable date: the dates to be considered for disclosure reports are as follows:

In Cash TOVs – the clearing date is the reportable date

In Kind TOVs – meeting or event end date is the reportable date

TOV in case of No Shows or cancellation:

- Cancellation Fees are not reported

- No-shows are not reported if Pfizer cannot confirm the in-kind benefit was received

Multi-year contracts: where contracts are valid for more than one year, each individual TOV is captured and disclosed in the reportable disclosure period.

Consent to publish & GDPR legal basis for disclosure of TOV's to individuals: depending on the jurisdiction, Pfizer discloses the TOV based either on (i) a legal duty; (ii) legitimate interest (iii) the consent of the HCPs (and HCOs where it is applicable by country code/law) to the disclosure of the TOV made to them.

In all cases, the EEA Pfizer HCP Privacy Notice is provided to the individuals and is available in those websites under our control where the TOV are disclosed. We make our best effort to advocate for transparency and explain its societal benefits.
As long as the legal basis is still valid (i.e., depending on the country, there have been no changes in the legal duty scope, no consent has been revoked or the individual has not objected to Pfizer's legitimate interest), the sum of all TOV to that HCP or HCO during the reporting period is disclosed under their name.
In markets where consent is required for disclosure of TOV under the recipient's name, if the covered recipient has not provided consent the TOV are disclosed in the aggregate section of the report. This means that the transfer of value is not disclosed under the name of the HCP (or HCO for those markets where HCO consent applies), but as part of the sum of all the TOV.

Cross Border Reporting – TOV from Pfizer legal entities in other countries: the disclosure report includes TOV to HCPs and HCOs who practice in the disclosure report country. This includes all TOV (direct and indirect) made by any Pfizer affiliates in the European countries included in the EFPIA disclosure code. For non EFPIA countries, Pfizer will do their best effort to collect and disclose direct TOV made by Pfizer affiliates.

Currency: TOV are reported in local currency on the disclosure report. TOV 's made in a non-local currency are converted to local currency prior to publication. The Pfizer standard exchange rates for the TOV day of payment are applied.

Disclosure language: Disclosure reports will be published using the language as defined by the local trade association code/law.

PO/PAG inclusion in disclosure reports: PO's/PAGs will only be included in the disclosure report if they are in scope for reporting as defined in the country code/law.

Value Added Tax (VAT): Treatment of VAT depends on the TOV:

Where possible in kind related TOV's will be reported **excluding tax**

Where possible direct payment TOV's will be reported **excluding tax**

5. Publication

Publication/Republication: Pfizer will publish transparency disclosure reports in line with country timelines as defined by the trade association or government. Republication will be carried out as and when needed in line with local codes/laws.