

# **Pfizer Cyprus: Methodology note for HCP/HCO disclosure 2025**

**Data year: 2025**

**Year of publication: 2026**

## **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.

## Table of Contents

|                                       |   |
|---------------------------------------|---|
| 1. DEFINITIONS .....                  | 4 |
| 2. DISCLOSURE'S SCOPE.....            | 7 |
| 3. SPECIFIC CONSIDERATIONS .....      | 8 |
| 4. DATA PROTECTION LEGAL BASIS .....  | 8 |
| 5. FORM OF DISCLOSURE.....            | 8 |
| 6. DISCLOSURE OF FINANCIAL DATA ..... | 8 |
| 7. ADDITIONAL INFORMATION .....       | 8 |

# 1. Definitions

## 1.1. Recipients:

**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 Cyprus. For the purpose of this Code, the definition of HCPs includes: 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 any employee of a Member Company whose primary occupation is that of a practising HCP, but excludes all other employees of a Member Company and a wholesaler or distributor of Medicinal Products.

**HCO:** any legal person/entity 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 Cyprus or through which one or more HCPs provide services.

**Covered Recipient:** any reportable HCP or HCO

**PO/PAG:** 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 Cyprus.

**Retired HCPs:** ToVs of retired HCPs are not published

**Deceased HCPs:** ToVs of deceased HCPs are not published

## 1.2. Kind of ToVs:

**ToV:** Transfer of Value – 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 POM exclusively for human use.

**Direct ToVs** are those made directly by a KEFEA member for the benefit of a Recipient.

**Indirect ToVs** are those made on behalf of a KEFEA member for the benefit of a Recipient, or those made through a Third Party and where the KEFEA member knows or can identify the Recipient that will benefit from the Transfer of Value.

## 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                                | <ul style="list-style-type: none"> <li>Charitable contributions</li> <li>Business donations</li> <li>Educational grants (e.g. fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating)</li> <li>Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Contribution to Cost of Events   | Sponsorship agreements (HCOs only) | <ul style="list-style-type: none"> <li>Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>Funding an event in return for a display booth</li> <li>Funding an event in exchange for advertising space</li> <li>Other advertisement space (in paper, electronic or other format)</li> <li>Satellite symposia at a congress</li> <li>Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies</li> <li>Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according Pfizer’s Anti-Corruption Policies</li> <li>For contributions provided to Events through Professional Conference Organisers (PCOs): TOVs through PCOs are reported as follows: <ul style="list-style-type: none"> <li>either in the name of benefitting HCO</li> <li>or in the name of Recipient PCO</li> </ul> </li> </ul> |
|                                  | Registration fees                  | <ul style="list-style-type: none"> <li>Registration fees paid for the HCP/HCO to attend events</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                  | Travel & Accommodation             | <ul style="list-style-type: none"> <li>Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation)</li> <li>Accommodation</li> <li>Travel Visa</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                  | Fees                               | <ul style="list-style-type: none"> <li>Speaker engagements</li> <li>Advisory Boards*</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

|                                             |                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fee for services and consultancy            |                  | <ul style="list-style-type: none"> <li>• Study-related engagements</li> <li>• Preceptorships</li> <li>• Post-marketing surveillance studies</li> <li>• Non-Interventional Studies that are retrospective in nature</li> <li>• Medical writing</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Speaker training if linked to a speaker engagement</li> <li>• Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies</li> </ul> |
|                                             | Related expenses | <ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Travel Visa</li> </ul>                                                                                                                                                                                                                                                                                                                                                                    |
| Research and Development Transfers of Value | n/a              | <ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non-Interventional Studies that are prospective in nature</li> <li>• Investigators Initiated Research (IIR)</li> <li>• Investigator Sponsored Research (ISR)</li> <li>• Clinical &amp; Research Collaboration</li> </ul>                                                                                                                                                                                                      |

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

## 2. Disclosure's Scope

**2.1. Products concerned:** This report includes ToVs related to Prescription Only Medicines.

**2.2. Company concerned:** This report includes ToVs processed by Pfizer Cyprus legal entities and includes ToVs from all Pfizer legal entities.

**2.3. Excluded ToVs:** no reportable ToVs as defined by the Code have been excluded.

**2.4. ToVs Date:** This report includes ToVs related to the reporting period for 2025.

**2.5. Direct ToVs:** the clearing date is the reportable date

**2.6. Indirect ToVs:** the clearing date is the reportable date

**2.7. Non-monetary ToVs:** meeting or event: end date is the reportable date; benefit in kind donation: contract signature date is the reportable date

**2.8. ToVs in case of partial attendances or cancellation and refund:**

- Cancellation Fees are not reported
- No-shows are not reported if Pfizer is unable to confirm the in-kind benefit was received

**2.9. Cross-border activities:** The disclosure report includes ToVs to HCPs and HCOs who practice in the disclosure report country. This includes all ToVs (direct and indirect) made by any Pfizer affiliates.

**2.10. R&D:** see section 1.2, Transfer of Value Categories

**2.11. Voluntary disclosure:** n/a

### 3. Specific considerations

**3.1. Country unique identifier:** n/a

**3.2. Self-incorporated HCP:** are considered HCPs

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

**3.4. Country specificities:**

- **Working with other pharmaceutical companies:** each company is accountable for reporting the ToVs that they manage.

**3.5. Quality checks:**

- In compliance with our global SOP

### 4. Data protection legal basis

**4.1. Consent collection:** Consent is requested from each HCP for a specific reporting period.

**4.2. Legitimate interest:** n/a

### 5. Form of disclosure

**5.1. Date of publication:** 30 June 2026

**5.2. Disclosure platform:** Pfizer website – [www.pfizer.gr](http://www.pfizer.gr)

**5.3. Disclosure language:** English

### 6. Disclosure of financial data

**6.1. Currency:** EUR. ToV's made in other currencies are converted to EUR prior to publication. The Pfizer standard exchange rates for the ToV on the day of payment are applied.

**6.2. Value Added Tax (VAT):** Treatment of VAT depends on the ToV:

- Where possible in kind related ToVs will be reported **excluding tax**
- Where possible Direct payment ToVs will be reported **excluding tax**

### 7. Additional information

n/a