

Pfizer Malta:

Methodology note for

HCP/HCO disclosure 2025

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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.

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1. Definitions

1.1. Recipients:

HCP: natural person who is identified as a healthcare professional in the applicable legislation and whose primary practice or principal professional address is in Greece and who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer medicinal products.

It is explicitly clarified that the very broad subset of Healthcare Professionals who are not legally entitled to prescribe, supply or administer medicinal products, but nevertheless belong to the category of Healthcare Professionals, are not considered as general public. In this sense, product promotions at scientific event venues where such persons may be present are not prohibited. In the context of the national cancer policy, the specialty of pathologists is also explicitly included in this definition.

To avoid any doubt, the term “Healthcare Professional” also includes: a) any official or employee of a government agency or other organisation (whether in the public or private sector) who may prescribe, purchase, supply, recommend or administer Medicinal Products; and b) any employee of a Pharmaceutical Company whose primary occupation is that of a practising HCP (e.g. medical doctor, nurse, dentist, etc.).

HCO: any legal entity: a) that is a healthcare, medical or scientific association (civil code society or union of HCPs) or healthcare organisation (irrespective of its legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for POs) whose business address, place of incorporation or primary place of operation is in Greece; or b) through which one or more HCPs provide services, including private providers of Primary Healthcare services.

Covered Recipient: any reportable HCP or HCO

PO/PAG: Patient Organisation/Patient Advocacy Group. Not-for-profit entity that represents and/or supports the needs of people suffering from medical conditions.

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 – Any transfer of value, either as remuneration for service provided or as contribution to costs related to a training/continuing education activity. Included in this definition are direct or indirect transfers, whether in cash or in kind or otherwise, made for promotional purposes or otherwise, in connection with the development and sale of prescription-only medicinal products exclusively for human use.

Direct ToVs are those made directly by a PC for the benefit of a recipient.

Indirect ToVs are those made on behalf of a PC for the benefit of a Recipient, or those made through a third party and where the PC knows or can identify the Recipient.

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 other format) • Satellite symposia at a congress • 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
	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

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 Malta 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

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