

# **Pfizer Hellas SA**

# **PRIMA/EFPIADisclosure Code**

# **Transparency Report**

## **Methodological Note**

**Malta**

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## 1. Introduction

We regularly work with healthcare professionals (HCPs) and healthcare organizations (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 want people to know, and understand, what we do and how we do it. 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.

The EFPIA Disclosure Code provides a common basis for reporting across Europe in relation to transfers of value. For more information on this Code visit: <http://transparency.efpia.eu>

The Pharmaceutical Research Based Industry Malta Association (PRIMA), a member of EFPIA, has adopted its own Disclosure Code that can be found here:

<http://transparency.efpia.eu/countries/18/16/Malta>

Disclosure of payments made to HCPs and HCOs during the previous year, will be available on <http://www.visalomone.com/> & <http://www.viviancorp.com/>

This report discloses all the transfers of value made to Health Care Professionals (HCPs) and Health Care Organizations (HCOs) in the previous year. This methodological note presents some of the key aspects of how the transfers of value are categorized and in what format they are disclosed.

The transfers of value disclosed in this report cover all the payments made by Pfizer to HCPs and HCOs resident (i.e. licensed to practice) in Malta through 3<sup>rd</sup> party Distributors.

## 2. Pfizer activities per EFPIA category

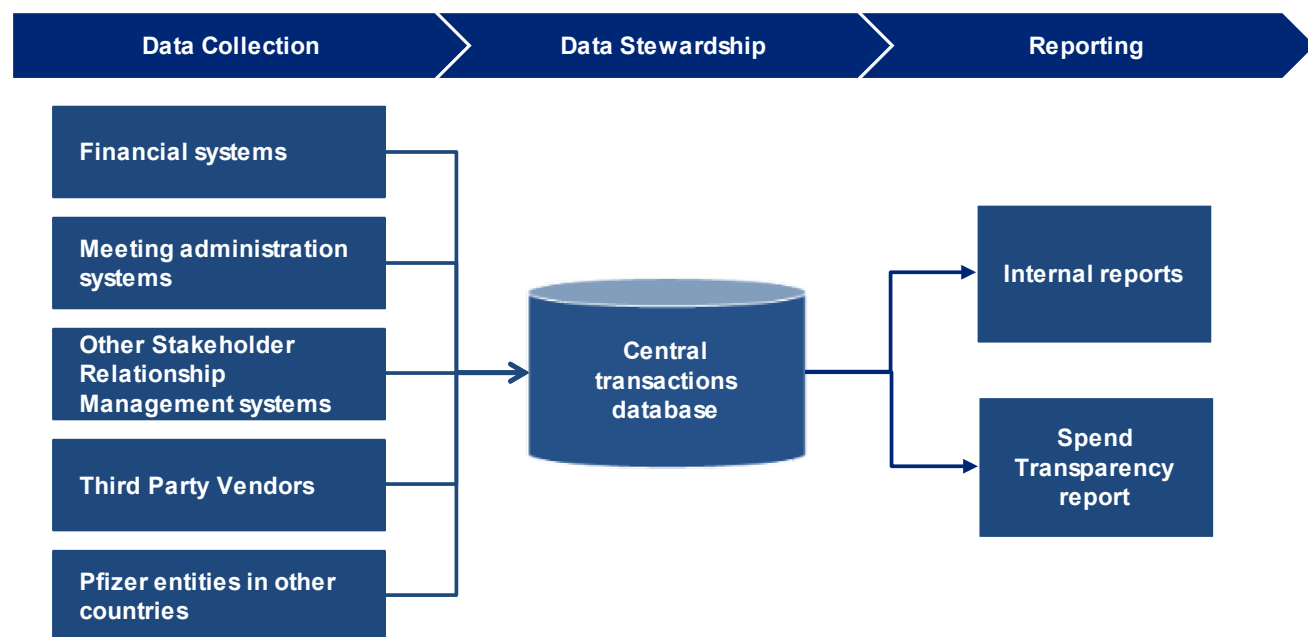
The following table defines what activities are reported in which EFPIA category and subcategory.

EFPIA category	EFPIA subcategory	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 a HCO where the 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> <li>• Research 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>• If part of a package: Name badges, drinks, meals etc. provided by the organizers (included in the sponsorship agreement)</li> <li>• Any other activity qualified as “Corporate Sponsorship” according 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> </ul>
	Registration fees	<ul style="list-style-type: none"> <li>• Fees paid for the HCP/HCO to attend events not organized by Pfizer</li> </ul>
	Travel & Accommodation	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Visa</li> </ul>

Fee for services and consultancy	Fees	<ul style="list-style-type: none"> <li>• Speaker engagements</li> <li>• Advisory Boards (excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&amp;D)</li> <li>• Study-related engagements</li> <li>• Preceptorships</li> <li>• Post-marketing surveillance studies</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>• 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</li> <li>• Investigators Initiated Research (IIR)</li> <li>• Clinical &amp; Research Collaboration</li> </ul>

### 3. Sources of Information

The data for the transfers of value disclosed in this report are taken from a variety of source systems within Pfizer. Below is a high-level overview of the processes for collection and reporting of the data.



The transfers of value are collected from the internal and external data sources and systems and then fed into a central database where data is validated and stewarded. From the database, the disclosure reports are generated.

## 4. Definition of the Transfers of Value

This section outlines some key aspects of how the transfers of value are defined.

**Definition of 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 or 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. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organization (whether in the public or private sector) that may prescribe, purchase, supply or administer medicinal products and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of a Member Company and (y) a wholesaler or distributor of medicinal products.

**Definition of HCO:** Any legal person (i) that is a healthcare, medical or scientific association or organization (irrespective of the legal or organizational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of the PRIMA PO Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more HCPs provide services.

**Pfizer employees who practice as HCPs:** Any HCP with an employment contract with 3<sup>rd</sup> Party Distributors who may also practice as a physician is out of scope for this report.

**Timing of transfers of value:** This report discloses all transfers of value whose transfer of value date falls during the previous year.

**Transfer of Value date:** the dates to be considered for disclosure are:

Direct ToV(in value): Transfer of value date is the payment date. Corporate Sponsorships are an exemption to this rule as ToV date is the event End Date.

Direct or Indirect ToV (in Kind): ToV date is the delivery date of Goods, that is the date of dispatch note.

Indirect ToV: Transfer of value date is the date of the event (last day of the event in case of multi-days event)

**Transfer of Value in case of partial attendances or cancellation:**

- Cancellation Fees are not reported
- Transfer of value in case of HCP partially attending an event is disclosed

**Multi-year contracts:** Where contracts are valid for more than one year, each individual transfer of value is captured and disclosed in the corresponding reporting period.

**Consent from HCPs/HCOs to disclose transfers of value:** Pfizer asks HCPs whether they consent to the disclosure of the transfers of value made to them (one single consent per HCP per calendar year starting from first day of initial collaboration of current year; consent by funding confirmation letter or contract). We do our best effort to advocate for transparency and convince HCP and HCO to provide their consent.

If the HCP consents to disclosure, the sum of all transfers of value to that HCP during the reporting period is disclosed under their name.

If the HCP does not provide consent to disclosure, all the transfers of value in the reporting period are reported in the “aggregate” section of the report. This means that the transfer of value is not disclosed under the name of the HCP, but as part of the sum of all the transfers of value to any HCP who did not provide consent during the reporting period.

Consent once provided can also be revoked. If so, the report is updated within one month, given that this is the time required for changes to the recorded information to be made in our systems.

There are no consent requirements for HCOs.

**Over-the-counter medicines (OTC):** OTC medicines out of scope for this report.

**Transfers of value from Pfizer legal entities in other countries (cross border transfers of value):**

This report includes transfers of value to HCPs and HCOs who are residents of Malta. This includes all transfers of value (direct and indirect) made by any Pfizer affiliates in the remaining 32 European countries included in the EFPIA disclosure code. For non EFPIA countries, Pfizer will do their best effort to collect and disclose direct payments made by Pfizer affiliates.

Cross border transfer of values will be disclosed in the “aggregate” section of the document unless a consent was obtained.

In future disclosures, we will continue the journey to transparency including the continuous improvement of our cross borders process.

**Currency:** Transfers of value are reported in Euro (€) . Transfers of value made in a different currency were converted to Euro (€) when this report was created. The Pfizer standard exchange rates for the transfer of value day of payment were applied.

**Value Added Tax (VAT):** Treatment of VAT depends on the transfer of value:

Scenario	Reported as...
Events and meetings	Gross Value Reporting
Corporate Sponsorships	Gross Value Reporting
Donations and Grants (Value or Kind)	Gross Value Reporting
Consultancy services fees	Gross Value Reporting
Other expenses related to Consultancy Services fee (e.g. Travel)	Gross Value Reporting



Research and Development services	Not applicable
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#### **Valuation of in kind donations:**

As transfer of value for in kind donation will be deemed either value of purchase or the residual value in case of fixed assets as this is reflected in company's records at the time of the donation. In case of Pfizer products donation the transfer of value will be deemed the billing cost.

#### **Definition of reporting amounts:**

**Gross Value Reporting = Expense Amount + {VAT &/or Other Tax}**

**Net Value Reporting= Expense Amount**

**where 'Expense Amount' = 'net of VAT & other taxes'**

**Country Unique Identifier:** Pfizer Hellas SA in Malta is using Health Care Professions Regulatory Council Registration ID for HCPs and the Healthcare Organization Council Registration ID for HCO as internal identifier in its systems.

**Self-Incorporated HCP:** considered any Legal Entity belongs to one single Person that is an HCP. According to EFPIA Code, Disclosure is made on the Recipient's name. Any amount paid by Pfizer through a 3rd Party Distributor to a legal entity owned by a physician, will be disclosed under the name of the legal entity (considered an HCO under the Code), as this is the Recipient of the payment (ToV).