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John Young
Group President
Pfizer Essential Health

**EFPIA Disclosure Code
2016 Self-Certification Scheme**

Healthcare professionals (HCPs) and healthcare organisations (HCOs) with whom Pfizer works provide the Pharmaceutical Industry with valuable, independent and expert knowledge derived from their clinical and management experience. As owners of scientific knowledge and experts in medicinal products, pharmaceutical companies can be a unique resource to the healthcare systems and providers, which will ultimately benefit the patients.

Throughout the medicines life cycle pharma companies work with scientists and healthcare professionals. These collaborations are essential in addressing patient needs. Industry and healthcare professionals collaborate in a range of activities from clinical research to sharing best clinical practice and exchanging information on how new medicines fit into the patient pathway.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions of their member companies with healthcare professionals and organisations meet the high standards of integrity and transparency. Building greater transparency to the relationships between pharma companies and HCPs/HCOs aims to building understanding of the collaboration and recognition of its value to patient care.

Pfizer hereby confirms that its disclosures of transfers of value (ToVs) to HCPs and HCOs made in 2015 have been reported in application of the EFPIA Disclosure Code following key principles:

Disclosure quality

Pfizer certifies that:

- Its disclosures are made in each country where it operates;
- Its disclosures include direct and indirect ToVs, as defined in the codes and associated guidance issued by EFPIA;
- Its Methodological Note describes the process it has followed in order to compile the data hereby disclosed.

Methodology used for the collection and organisation of ToVs is in line with the EFPIA Disclosure Code's requirements and applicable codes

Pfizer certifies that:

- Data collection complies with the requirements of the EFPIA Disclosure Code;
- Actions were taken to seek consent from HCPs and HCOs (each as defined in the EFPIA Disclosure Code), where applicable.

Aggregate disclosures are limited to Research and Development ToVs and such ToVs that cannot be disclosed on an individual basis for legal reasons

Pfizer certifies that aggregate disclosure is limited to the following topics:

- Research and Development Transfers of Value (as defined in the EFPIA Disclosure Code);
- Transfers of Value to Recipients that have opposed to the publication on grounds of the protection of their private data;
- If an HCP or HCO (where applicable) has provided consent to individual disclosure only in respect of part of the Transfers of Value he/she/it received, all Transfers of Value to such HCP or HCO (where applicable) are being disclosed in the aggregate.

Seeking the consent of Recipients

Pfizer certifies that it has used all reasonable steps for the purpose of obtaining consent to individual disclosure where such consent is required by applicable law.

Date: 20/06/16

Name of signatory: JOHN YOUNG

Position in the Company: GROUP PRESIDENT.

Signature:



EFPIA Disclosure Code Self-certification scheme the Netherlands

Healthcare professionals and organisations, with whom Pfizer (the Netherlands) works, provide the Pharmaceutical Industry with valuable, independent and expert knowledge derived from their clinical and management experience.

Pfizer (the Netherlands) believes that interactions between pharmaceutical companies and healthcare professionals – either directly or through healthcare organisations – have a profound and positive influence on the quality of patients treatments and value of future research.

EFPIA and its member associations have adopted codes and guidelines to ensure that the interactions meet the high standards of integrity that patients, governments and other stakeholders expect.

Because the society has a growing expectation that interactions between corporations & healthcare professionals and organisations are not only conducted with integrity but are also transparent, Pfizer (the Netherlands) discloses transfers of values made to healthcare professionals and organisations in due respect of EFPIA Disclosure code's requirements.

All individual data published in our disclosure have been made with the support of healthcare professionals and organisations.

Pfizer (the Netherlands) complies with the local disclosure legislation or regulations, where applicable and commits to apply EFPIA Disclosure Codes provisions and especially the following key principles.

Pfizer has policies and procedures governing how and under what circumstances payments or other exchanges of value may be made to HCPs and institutions including how these activities/payments are to be captured within Pfizer financial systems. These policies and procedures are outlined in "[My Anti-Corruption Policy and Procedures](#)"

Disclosure quality (fair and complete)

Pfizer (the Netherlands) certifies that:

- Its disclosure is made in each country where it operates.
- This disclosure includes direct and indirect Transfers of Values (ToVs) with definitions in line with the Disclosure code's requirement.
- Its Playbook/local procedure explains decisions related to the Disclosure.

Methodology used for the collection and organisation of ToVs are in line with EFPIA Code's requirements

Pfizer (the Netherlands) certifies that:

- Data collection complies with Disclosure code's requirement, especially in the consent collection.
- Actions were put in place to gain consent from HCPs (and HCOs where applicable).
Pfizer (the Netherlands) applied the following principle "no consent – no work" whenever legally allowed

Aggregate disclosures are limited to R&D and ToVs where information cannot be disclosed on an individual basis for legal reasons

Pfizer (the Netherlands) warrants that aggregate disclosure is limited to the following topics:

- R&D (with an exclusion of the non-interventional studies which are retrospective).
- HCPs (HCOs where applicable) data in case of non-positive consent for individual disclosure.
→ This is not applicable for the Netherlands, because we are a no consent, no work country)
- If an HCP (an HCO where applicable) chooses to grant only partial consent, (name of the company) will disclose all ToVs to such HCP (HCO where applicable) in aggregate. → This is not applicable for the Netherlands, because we are a no consent, no work country)

Provided efforts on gaining consent of Recipients

Pfizer (the Netherlands) warrants that it has made its best efforts in seeking consent from HCPs (HCOs where applicable) for individual disclosure.

Data quality and Integrity

The process to provide the disclosure report requires data extraction from several transactional systems and the implementation of manual data collection across Pfizer Inc. The electronic and manual data retrieval processes are complex and pivot on colleague adherence to current policies and third party vendors providing accurate data.

The Transparency team within the Pfizer Medical Division is accountable for ensuring that data is appropriately extracted, loaded in the Transparency Repository System, stewarded and organized as outlined in the Data Stewardship playbook (available in this [folder](#)) and posted to Pfizer's website <http://www.pfizer.nl/transparantieregister> and central national platform <http://transparantieregister.nl/nl-NL/Raadpleeg-het-Transparantieregister>.

However, the responsibilities for ensuring transactions are accurate extend throughout the organization. The responsibilities are shared and begin with each colleague who initiates an HCP/institution-related transaction adhering to established processes which outline appropriate documentation and expense classification. Business Process Owners for each transaction types (e.g., speaker programs, consulting) must also execute their duties, which include ensuring processes are followed, reporting any known violations and correcting known errors or misclassifications as soon as possible. The processes and responsibilities for these front end requirements are outlined in various corporate and divisional SOPs throughout Pfizer.

Pfizer the Netherlands (Pfizer bv & Pfizer PFE bv)



Name: Wiebke Rieb

Function title: Country Manager

Date: 10.3.16

