Pfizer 2019
Disclosure Code Transparency Report

Methodological Note

Pfizer Lithuania

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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 (ToV). For more information on this Code visit: http://transparency.efpia.eu or http://www.ifpa.lt/

Here in Lithuania disclosure of ToV made to HCPs and HCOs during 2018 will be available on 30th of June of 2019 at www.pfizerdisclosure.lt.

This report discloses all the ToV made to Health Care Professionals (HCPs) and Health Care Organizations (HCOs) in 2018. 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 ToV disclosed in this report cover all the payments made by Pfizer to HCPs and HCOs resident in Lithuania.

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	• Charitable contributions • Business Donations • Educational grants (e.g. fellowships, courses provided by a 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 organizers (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 Pfizer’s Anti-Corruption Policies • For contributions provided to Events through Professional Conference Organizers(PCOs) : ToVs through PCOs are reported as follows: either in the name of benefitting HCO or in the name of Recipient PCO
	Registration fees (only for	• Fees paid for the HCP/HCO to attend events not

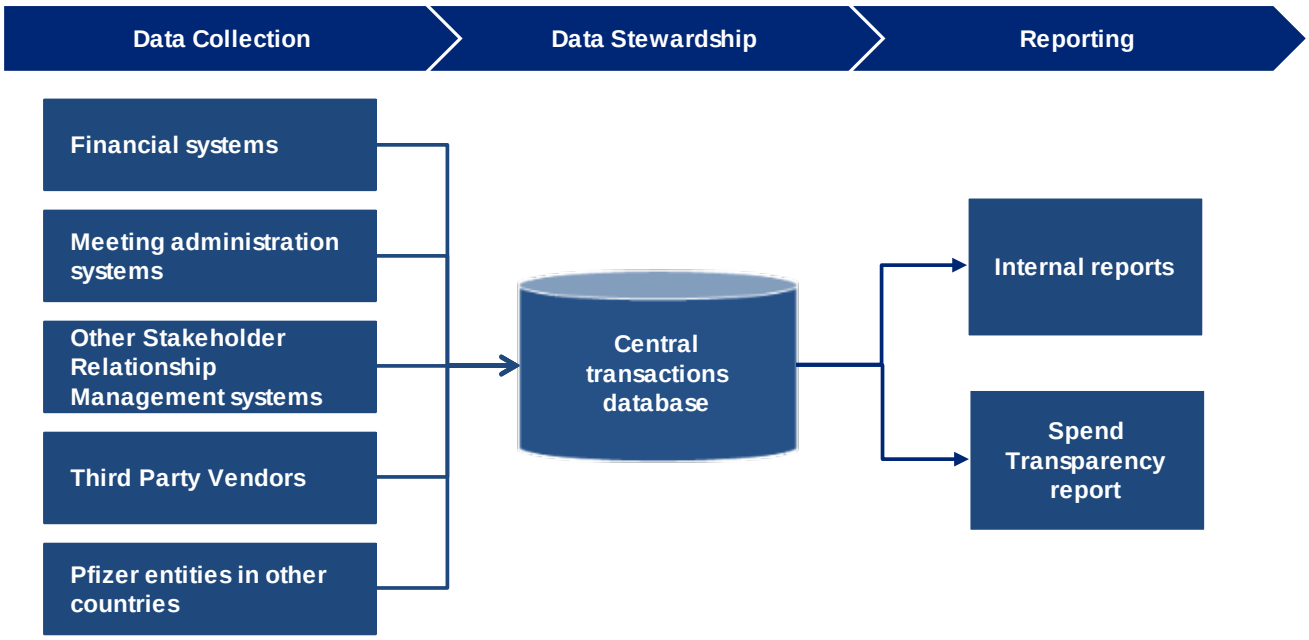
	scientific/professional event)	organized by Pfizer
	Travel & Accommodation (only for scientific/professional event)	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Visa • Health Insurance linked to travel requirement [ONLY in case the following expenses are reimbursed: Health insurance, life insurance, travel to obtain visa (i.e. train to embassy). Otherwise delete this bullet]
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 • Visa • Health Insurance linked to travel requirement [ONLY in case the following expenses are reimbursed: Health insurance, life insurance, travel to obtain visa (i.e. train to embassy). Otherwise delete this bullet]
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) • Clinical & Research Collaboration

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

3. Sources of Information

The data for the ToV 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 ToV 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 (ToV)

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

Definition of HCP: Physicians as well as other persons that are members 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 or administer a medicinal product and whose primary practice, principal professional address or place of incorporation is in Lithuania. 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 Pfizer whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of Pfizer 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 organizations within the scope of the Annex C to the Code of Ethics "Code of Practice on Relationships between Pharmaceutical Industry and Patient Organizations") whose business address, place of incorporation or primary place of operation is in Lithuania or (ii) through which one or more HCPs provide services.

Timing of ToV: This report discloses all ToV whose transaction date falls within the year 2018. The transaction date is defined as the clearing date in the financial system. In the case of meetings, it is the last day of the meeting.

ToV date: the dates to be considered for disclosure are:

Direct ToV: payment date (Financial system clearing date)

Indirect ToV: Reporting date is the date of the event.

ToV 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 ToV is captured and disclosed in the corresponding reporting period.

GDPR legal basis (to disclose ToV regarding individuals): Depending on the jurisdiction, Pfizer discloses the ToV based either on (i) a legal duty; (ii) the consent of the HCPs the disclosure of the ToV made to them; or (iii) the so-called legitimate interest GDPR ground, that is explained in the EEA Pfizer HCP Privacy Notice. 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. Our disclosures do not contain full governmental identifiers of the individuals at hand (unless imposed by local law) and technical measures have been adopted in the websites where the ToV are disclosed under our control to minimize to the extent possible that the individual names may be easily found through search engines.

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 during the reporting period is disclosed under their name.

If the status of the applicable legal basis changes, the report is updated within 30 days after receiving the official declaration personally signed by the HCP. In particular, if none of the above legal basis applies, 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, but as part of the sum of all the ToV which cannot rely on any of the above-mentioned legal basis (for example, if based on consent, regarding any HCP who did not provide consent -or later revoked it- to the disclosure of at least one transfer of value) during the reporting period.

Over-the-counter medicines (OTC): OTC medicines are in scope for this report.

ToV from Pfizer legal entities in other countries (cross border ToV): This report includes ToV to HCPs and HCOs who are residents of Republic of Lithuania. This includes all ToV (direct and indirect) made by any Pfizer affiliates in the 33 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.

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

Currency: ToV are reported in EUR. ToV made in a different currency were converted to EUR when this report was created. The Pfizer standard exchange rates for the ToV day of payment were applied.

Value Added Tax (VAT): Transfers of value are reported as gross amount (with VAT where it is applicable).

Other Taxes: Transfers of value related to Honorarium for HCPs are reported as gross amount (with personal income tax, pension social insurance tax from the insured party and health insurance tax from the insured party).

Valuation of in kind donations: Disclosed values of in-kind donations are reported as gross amount (with VAT, if that product is subject to the tax). Valuation of donations in products, which are included in this report as cross border transfers of value, made by other Pfizer affiliates, are disclosed according to the price indicated in the donation transfer acceptance deed and declared to the Ministry of Health of the Republic of Lithuania, if applicable.

Country Unique Identifier: HCOs are disclosed with Legal Entity's Code. HCPs are disclosed with HCP's stamp ID number.

Self-Incorporated HCP: In case of value transferred to self-incorporated HCP's company disclosure will be made on HCO level through which one or more HCPs provide services.

Group transportation: Transfers of value made in the form of mass group transport for a group of HCPs which cannot be apportioned / allocated to each individual HCP having benefitted from the "Travel and Accommodation" are disclosed in aggregate.