# Pfizer 2015 Disclosure Code Transparency Report

## Methodological Note

Pfizer Belarus

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## 1. Introduction

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 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

Here in Belarus disclosure of payments made to HCPs and HCOs during 2015, will be available no later than 30th of June, 2016 on website www.pfizer.by

This report discloses all the transfers of value made to Health Care Professionals (HCPs) and Health Care Organisations (HCOs) in 2015. 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 in Belarus.

## 2. Pfizer activities per EFPIA category

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

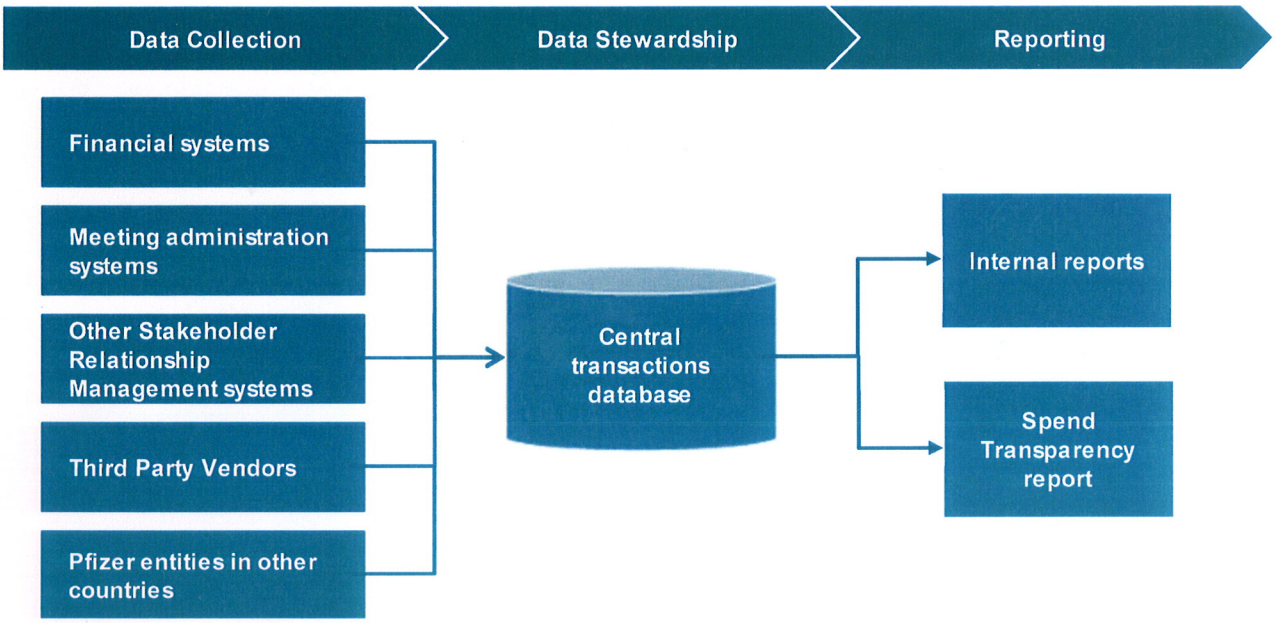
| EFPIA category | EFPIA subcategory | Activities |
|---|---|---|
| Donations and Grants (HCOs only) | n/a | • Charitable contributions<br>• Business Donations<br>• Educational grants (e.g. fellowships, courses provided by a HCO where the Pfizer does not select the individual HCPs participating)<br>• 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<br>• Funding an event in return for a display booth<br>• Funding an event in exchange for advertising space<br>• Other advertisement space (in paper, electronic or other format)<br>• Satellite symposia at a congress<br>• If part of a package: Name badges, drinks, meals etc. provided by the organisers (included in the sponsorship agreement)<br>• Any other activity qualified as "Corporate Sponsorship" according Pfizer's Anti-Corruption Policies<br>• Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as "Corporate Sponsorship" according Pfizer's Anti-Corruption Policies |
| | Registration fees | • Fees paid for the HCP/HCO to attend events not organised by Pfizer |
| | Travel & Accommodation | • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)<br>• Accommodation |

| | | |
|---|---|---|
| | | • Visa<br>• Health Insurance linked to travel requirement |
| Fee for services and consultancy | Fees | • Speaker engagements<br>• Advisory Boards*<br>• Study-related engagements<br>• Preceptorships<br>• Post-marketing surveillance studies<br>• Medical writing<br>• Data analysis<br>• Development of educational materials<br>• General consulting / advising<br>• Speaker training if linked to a speaker engagement<br>• 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)<br>• Accommodation<br>• Visa<br>• Health Insurance linked to travel requirement |
| Research and Development Transfers of Value | n/a | • Clinical Trials<br>• Data Monitoring Committees related to studies<br>• Non Interventional Studies<br>• Investigators Initiated Research (IIR)<br>• 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 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 Belarus. For the avoidance of doubt, the definition of HCP includes: (i) any official or employee of a government agency or other organisation (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 practising 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 organisation (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient organisations within the scope of the EFPIA PO Code) whose business address, place of incorporation or primary place of operation is in Belarus or (ii) through which one or more HCPs provide services.

**Timing of transfers of value:** This report discloses all transfers of value whose transaction date falls within the year 2015. 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.

**Transfer of Value date:** The date considered for disclosure is the payment date.

**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 and HCOs whether they consent to the disclosure of the transfers of value made to them. We do our best effort to advocate for transparency and convaince HCP and HCO to provide their consent. Consent shall be made in written form.

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

If there is a transfer of value that the HCP or HCO has not provided consent for, 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 HCPor HCO, but as part of the sum of all the transfers of value to any HCP or HCO who did not provide consent to the disclosure of at least one transfer of value during the reporting period.

Nevertheless for 2015 cross border transfer of values, we were not ready to collect consent and we disclose them in the "aggregate" section of the document.

Consent once provided can also be revoked. If so, Pfizer shall have the good intention the report is to be updated within 14 days after receiving the official declaration personally signed by the HCP or HCO.

**Over-the-counter medicines (OTC):** OTC medicines are 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 Belarus. This includes all transfers of value (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 payments made by Pfizer affiliates.

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

**Currency:** Transfers of value are reported in BYR (Belarusian Ruble). Transfers of value made in a different currency were converted to BYR (Belarusian Ruble) at the day of payment. The Pfizer standard exchange rates for the transfert of value day of payment were applied.

**Value Added Tax (VAT):** Transfers of value are reported as gross amount (with VAT if applicable).

**Other Taxes:** Transfers of value related to Honorarium for HCPs are reported as gross amount (with personal income tax, pension fund tax).

**Valuation of in kind donations:** Disclosed values of in kind donations are reported as gross amount (with VAT if applicable).

**Country Unique Identifier:** HCOs are disclosed with Legal Entity's Code. Country unique identifiers for HCPs are not indicated in this report.

**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.