



**CORPORATE POLICY # 703**

**Title: Equal Opportunity**

**Version: 1.4**

**Effective Date: 05/06/2004**

**Last Updated:12/04/2018**

**Sponsoring Division: Human Resources Division**

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## **1. PURPOSE AND SCOPE**

The purpose of this Policy is to define Pfizer's guiding principles with respect to equal opportunity and the prevention of discrimination, harassment and retaliation. This Policy applies to all colleagues.

## **2. POLICY**

Pfizer is committed to a workplace free of discrimination, harassment and retaliation of or against our colleagues, job applicants, contractors, interns, or volunteers by any colleague, supervisor, vendor, customer or third party.

It is Pfizer's policy to recruit, hire, assign, train, compensate, evaluate, promote, or terminate employment, and to manage all other terms, conditions and benefits of employment without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service or veteran status, medical condition (as defined by applicable law), the presence of a mental or physical disability, or any other characteristic protected by applicable national, state and local laws governing non-discrimination in employment.

Pfizer's commitment to equal opportunity extends to compensation and benefits. Pfizer reviews and monitors compensation to ensure that all colleagues are compensated fairly, equitably and consistent with Pfizer's global compensation philosophy, based on factors relevant to compensation, including job responsibilities, skills, education, experience, contributions and performance. Pfizer also supports pay transparency and colleagues may talk with one another about their compensation. In addition, Pfizer will continue to focus on equal opportunity and equal advancement by increasing access to growth and development opportunities for all.

Additionally, it is Pfizer's policy to provide a work environment that is free from harassment. Harassment is any unwelcome verbal, written, electronic, visual, physical, behavioral or other conduct that denigrates or demonstrates hostility or aversion towards an individual because of any protected characteristic.

This policy relates to conduct that is:

- made a condition of employment,
- used as a basis for employment decisions,
- has the purpose or effect of unreasonably interfering with an individual's work performance, or
- creates an intimidating, hostile or offensive working environment.

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Specifically, with respect to sexual harassment, the Company prohibits unwelcome conduct, communications, behaviors or actions based on gender. Examples of conduct that violates this Policy include, but are not limited to, the following:

1. unwelcome sexual advances or requests for sexual favors;
2. all other verbal, written, visual, physical or other conduct of a sexual nature, including where:
  - submission to such conduct is made either explicitly or implicitly a term or condition of employment;
  - submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual; or
  - such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.
3. offensive comments, jokes, innuendos, gestures, electronic communications, or other sexually oriented conduct .

In addition, a manager may not date or have a romantic or sexual relationship with any colleague who is in his or her reporting line or whose compensation, performance evaluation and/or career advancement the manager may influence. Similarly, a manager may not date or have a romantic or sexual relationship with a contingent worker whom the manager sponsors or whose assignment the manager otherwise may influence. If a manager becomes involved in such a relationship, he or she must inform his or her manager or Human Resources promptly so that the Company can evaluate the circumstances and take appropriate action (e.g., change assignments or reporting relationships) as needed. A manager who violates these requirements will be subject to disciplinary action up to and including termination.

In addition, and subject to local legal requirements, the Company prohibits other forms of harassment (not based on personal characteristics) that would be inconsistent with a professional and respectful work environment, including bullying, mobbing and other abusive workplace behavior.

Managers are responsible for ensuring compliance with this Policy and for communicating it to their reports. Managers have a responsibility to act and to report any potential violations of this Policy of which they become aware.

The Company is committed to ensuring open communication throughout the organization to resolve questions, concerns, problems or complaints, including those that involve discrimination, harassment or retaliation. Colleagues have a responsibility to report concerns about discrimination, harassment or retaliation as soon as they are aware of them, using any of the many channels available for raising concerns, including directly to their manager, or to another manager, Human Resources, Employee Relations, the Compliance Division or the Legal Division. By raising concerns, colleagues help ensure that the workplace is respectful and free of

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discrimination, harassment and retaliation, and give the Company the opportunity to investigate and address potential problems and protect Pfizer, co-workers and the public.

Applicants for employment who wish to raise concerns may contact any Pfizer manager or Human Resources professional or the Compliance Division.

Retaliation against anyone who seeks advice, raises a concern, reports misconduct or provides information in an investigation into a potential violation of this Policy is strictly prohibited and will not be tolerated. Any concerns about retaliation should be reported immediately to Human Resources or to the Compliance Division.

Colleagues also have the option to contact the Office of the Ombuds for guidance on addressing work-related issues in an informal, confidential manner. Communications with the Ombuds are “off-the-record” and do not constitute notice or reporting to the Company for any purpose.

Questions regarding this policy should be directed to the Human Resources Division.

### **3. CONSEQUENCES OF NON-COMPLIANCE**

Violations of this Policy may result in disciplinary action up to and including termination. Contingent workers will be subject to discipline according to the terms and conditions of the agreement with the contracted service provider.

### **4. REFERENCES**

Corporate Policy #702 Open Door Policy

Office of the Ombuds, available at <http://ombuds.pfizer.com> and by email at [ombuds@pfizer.com](mailto:ombuds@pfizer.com)