

# GLOBAL POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

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This policy covers the fundamental elements of Pfizer’s commitment to meeting our mission of delivering breakthroughs that change patients’ lives with integrity by setting forth our highest ethical standards, compliance with all applicable laws, regulations, professional requirements and Pfizer policy, including Pfizer’s code of conduct, and sharing best practices when interacting with healthcare professionals (HCPs).

We recognize that the primary duty of practicing HCPs is to the patients they serve. Therefore, our interactions with HCPs must be consistent with and support the integrity of the relationship that HCPs have with their patients and customers.

## Guiding Principles

Fundamentally, our interactions with HCPs must advance patient care and support ethical practices by HCPs. All our interactions must be consistent with Pfizer’s values of Courage, Excellence, Equity, and Joy. The following three principles must always be followed when you interact or engage with an HCP:



Ensure  
Excellence  
for Patients



Act with  
Integrity



Be Transparent



## Policy

### Patient Focus

Facilitating access to quality healthcare requires all stakeholders (including industry, HCPs, and patients) working together to appropriately advance global health. We are committed to innovating new medicines, vaccines, and treatments designed to prevent, treat, alleviate, or cure disease and disease symptoms to support patient health and wellbeing, and we seek to facilitate access to these innovations. To help support this, we work with our stakeholders to make available appropriate information to patients, consumers, and HCPs, and we help create sustainable healthcare solutions including by using digital and virtual engagements.

In providing this information about our products, we strive to ensure that such communications are accurate, substantiated, scientifically rigorous and consistent with applicable legal and regulatory standards.

## Patient Samples

Samples of Pfizer products may be provided to HCPs in accordance with applicable laws. In markets where permitted, free samples of Pfizer products are provided to HCPs for distribution to their patients. Samples of prescription products may not be provided to HCPs for their personal use or for any purpose other than free distribution to patients for their use.

Pfizer product samples are provided so that patients, their HCPs, and consumers can become familiar with the products. Product samples may not be offered or given to solicit or reward prescribing or recommending practices. Samples may not be used as gifts and may not be sold, purchased, traded, or offered for sale. Pfizer businesses providing samples must track and maintain records on all samples distributed.

## Educational Grants and Research Grants

Pfizer provides educational grants to support bona fide independent educational programs. Pfizer supports these programs to facilitate life-long learning by HCPs to help enhance patient care. Pfizer also supports a broad range of research endeavors as a pharmaceutical manufacturer focused on health. We provide research grants to support scientifically compelling investigations approved by Pfizer's Medical or Research and Development groups. Requests for Pfizer funding are reviewed based on their merits and in accordance with all applicable laws, regulations, professional requirements and industry codes of conduct or practice. Such funding may not be used to influence or reward the recipient for present, past, or future use or support of Pfizer products or to influence the outcome of clinical trials. In addition to complying with local laws, independent medical education programs must contain scientifically rigorous content and disclose the fact that Pfizer is providing financial support. Finally, Pfizer colleagues must not control, influence, or contribute to the development or content of an Independent Medical Grant request or the resulting research, project, initiative, or medical education activity.

## Data Privacy

Pfizer is committed to respecting, appropriately handling, and protecting the privacy of individual health information. Pfizer generally obtains health data where we have individual consent to obtain and use the information (as in the context of clinical trials) or where the personal data is de-identified or aggregated so that Pfizer is unable to identify any individual's information from such data. In some instances, Pfizer may obtain identifiable health information without individual consent, but only as permitted by law, for example, in connection with important public health objectives (as in the collection of information on adverse events) or further research (for epidemiological research using healthcare databases). Pfizer requires that personal data in its care be protected appropriately, in compliance with applicable data privacy laws and regulations.



## Pfizer-hosted Educational or Promotional Meetings and Third-Party Meetings/Conferences

Pfizer-hosted educational and promotional meetings are designed to educate HCPs about our products or clinical trials. Pfizer also provides funding to third-party organizations to support medical education, congresses, and medical conferences. The main purpose of medical conferences, symposia and similar programs supported by Pfizer, whether virtual or in person, must be scientific exchange or medical education. All such meetings must be focused on education. Hospitality offered in connection with such meetings must not include Pfizer-sponsored entertainment (e.g., sporting or leisure) events. Pfizer hosted meetings must be held in appropriate venues conducive to the educational purpose of the meetings and, where practical, near where the majority of attendees live or work. In addition, Pfizer will not provide financial support for attendance by spouses or guests, unless qualified in their own right to attend.

In no instance will Pfizer provide financial support in a manner that is inconsistent with applicable law or regulation or as an inducement for a HCP to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

### Charitable Contributions

Pfizer provides charitable contributions to support public interest activities of recognized charities and third-party organizations. Requests for Pfizer funding are reviewed based on their merits and in accordance with all applicable laws, regulations, professional requirements and industry codes of conduct or practice. Such funding may not be used to influence or reward the recipient for present, past, or future use or support of Pfizer products or to influence the outcome of clinical trials.





## Disclosure of Clinical Trial Information

Results of Pfizer-sponsored interventional clinical trials evaluating the safety or efficacy of a Pfizer drug, device, or biologic product in patients are disclosed in a publicly available database. In addition, Pfizer discloses information in a public clinical trials registry about such Pfizer-sponsored studies when each trial begins.

## Discussions with HCPs

We recognize our interactions with HCPs may give rise to apparent or actual conflicts of interest. We support the disclosure of financial and other relationship interests that may create apparent or perceived conflicts of interest in research, education, or clinical practice. In addition, we have controls designed to ensure our interactions with HCPs employed by or affiliated with government or regulatory authorities comply with all applicable laws, regulations, professional requirements and industry codes of conduct or practice.

We provide product information to HCPs in the form of substantiated information about usage, safety, effectiveness, and other important product information. When promoting our prescription medicines, we must:

- Be accurate, truthful, and not misleading
- Ensure statements are consistent with product labeling
- Support all claims with adequately substantiated evidence
- Provide balanced information about benefits and risk
- Not make claims about investigational products or investigational uses of marketed products.

## Use of Healthcare Professionals as Consultants and Speakers

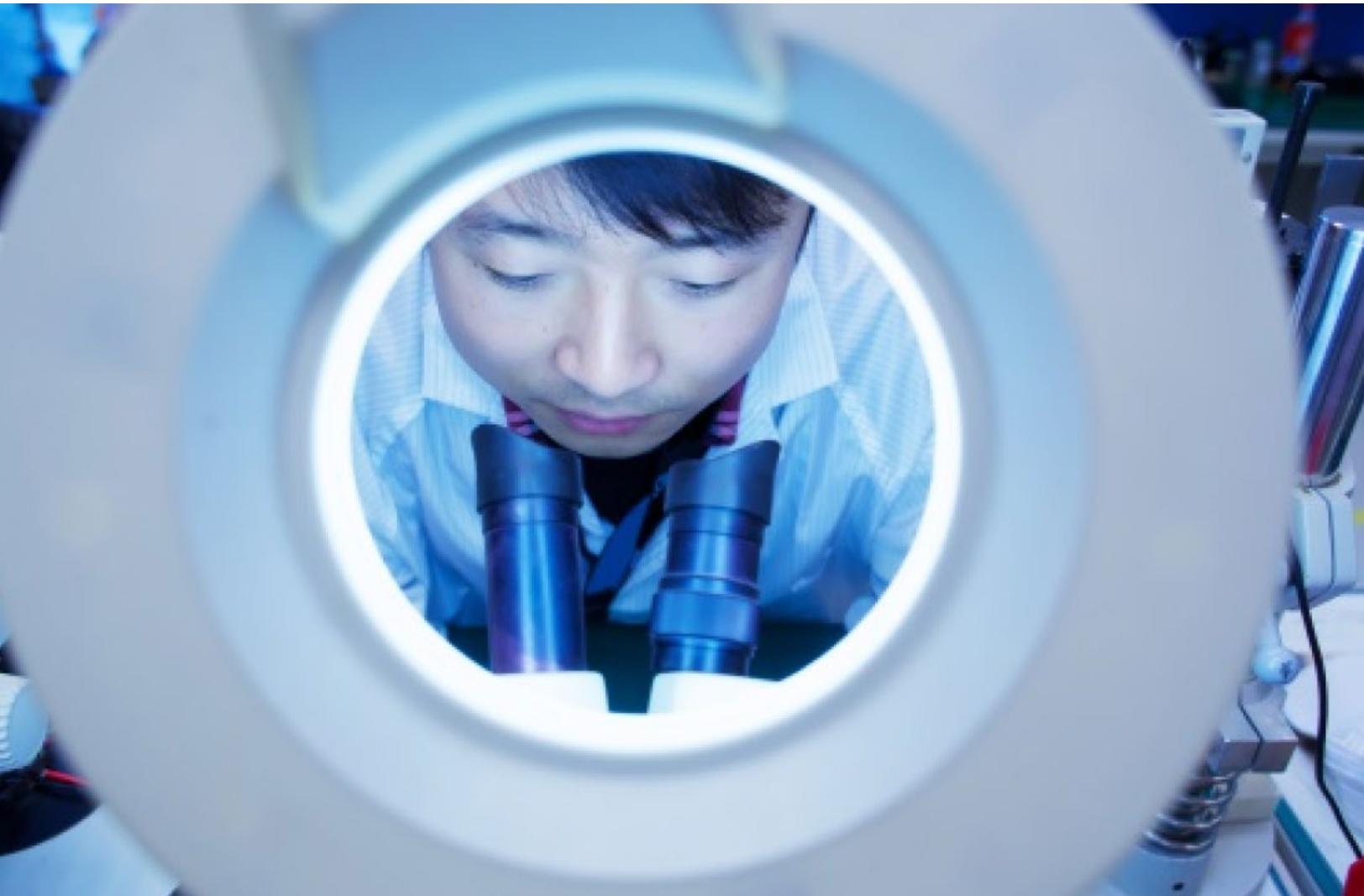
Qualified HCPs may be hired as consultants to provide bona fide services, such as assisting in the development of products (or product information), protocol development or other research, speaking at conferences, or training Pfizer colleagues. Payments to HCPs for such services may not exceed the fair market value of the services provided. The venue and circumstances of any consultant meeting must be conducive to the consulting services and consistent with our policies and values. The primary focus and time allocation of consultant meetings must be aligned to the legitimate need or contract for consulting services. Pfizer will only pay for the reasonable expenses (e.g., travel, meals, accommodation, and registration) incurred by a consultant who attends a scientific conference or third-party meeting in a professional capacity related to, or on behalf of, Pfizer. In no instance will Pfizer retain any HCPs, regardless of qualification, as an inducement for such HCPs to use, prescribe, purchase, or recommend a Pfizer product or to influence the outcome of a clinical trial. Pfizer is committed to appropriate interactions with HCPs and our colleagues are accountable for engaging with integrity consistent with Pfizer policies and applicable laws.

## Practice-related and Other Items Given to Healthcare Professionals

Pfizer is committed to complying with all applicable legal, regulatory, professional requirements and industry codes of conduct and practice related to the provision of practice-related and other items to HCPs. Under applicable codes, certain items of medical utility and promotional aids (pens, notepads) may be given in limited circumstances; all other gifts to HCPs are prohibited. In markets where permitted, non-cash items related to the practice of medicine may be provided free of charge to HCPs provided such items are of modest value, offered or provided only on an occasional basis, beneficial to enhancing the provision of medical services and patient care, and do not offset routine business practices (e.g., offset an HCP's routine operational expenses). Pfizer colleagues may not offer HCPs items of value as an inducement for such HCPs to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

## Ethical Research

All sponsored and supported research must be ethical in its design and implementation. Our sponsored clinical research must comply with well-accepted international standards, such as the Good Clinical Practice (GCP) guidelines of the International Conference of Harmonization, the Nuremberg Code, the Belmont Report and relevant national and local standards (e.g., the U.S. Pharmaceutical Research Manufacturers Association (PhRMA) Principles on the Conduct and Communication of Clinical Trial Results). All clinical research protocols must be reviewed and approved by local Institutional Review Boards or Ethics Committees, except where exempted by law, and must comply with Pfizer's standards for clinical research and publications, as described in our policies that govern clinical trials



This [Global Policy on Interactions with Healthcare Professionals](#) reflects our commitment to operating responsibly, ethically and with integrity in our business endeavors; to focusing on improving patient care and quality of life for patients in the communities in which we operate; and to ensuring our business activities support the best practice of medicine. By establishing and following this [Global Policy](#), we strive to fulfill those responsibilities.

