

A man in a dark suit and light blue shirt is looking down at a blue folder held by a woman in a white lab coat. The woman is also looking down at the folder and has a slight smile. The background is bright and out of focus.

GLOBAL POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

MAY 2019

GLOBAL POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Pfizer is committed to collaborating with physicians and other healthcare professionals, to developing new healthcare products, to educating healthcare professionals, patients, and consumers about our medicines and to sharing clinical experience with the use of our products. Our mission is to be the most valued company to patients, consumers, customers, colleagues, investors, business partners and the communities where we work and live. This ambitious mission reflects the broader role society expects Pfizer to take in improving the human condition and experience.

We are committed to ensuring that our educational efforts benefit patients and consumers and that our programs and collaborations do not have, or appear to have, an undue influence on medical judgment, prescribing, or product recommendations. To this end, we are guided by our company value of *Integrity*, our high ethical standards and our commitment to compliance with applicable legal, regulatory and professional requirements in the countries in which we operate. Our relationships with healthcare professionals, including our interactions with physicians, nurses, pharmacists and others who administer, prescribe, purchase or recommend regulated healthcare products, must meet the highest standards of integrity and must comply with applicable laws and regulations.

To that end, Pfizer has adopted this *Global Policy on Interactions with Healthcare Professionals*. This *Global Policy* governs interactions with healthcare professionals by Pfizer around the world, including marketing, medical, sales and research and development operations, with the limited exception of certain business-to-business interactions, which are defined by and must comply with other applicable Pfizer policies and guidelines. Irrespective of the type of interaction, all interactions with healthcare professionals by Pfizer around the world must comply with applicable laws, regulations, professional requirements and industry codes of conduct or practice. In the event of a conflict between this *Global Policy* and applicable laws, regulations, professional requirements, or industry codes of conduct or practice, the more restrictive provision applies.

Principles

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PRIMACY OF THE HEALTHCARE PROFESSIONAL–PATIENT/CONSUMER RELATIONSHIP

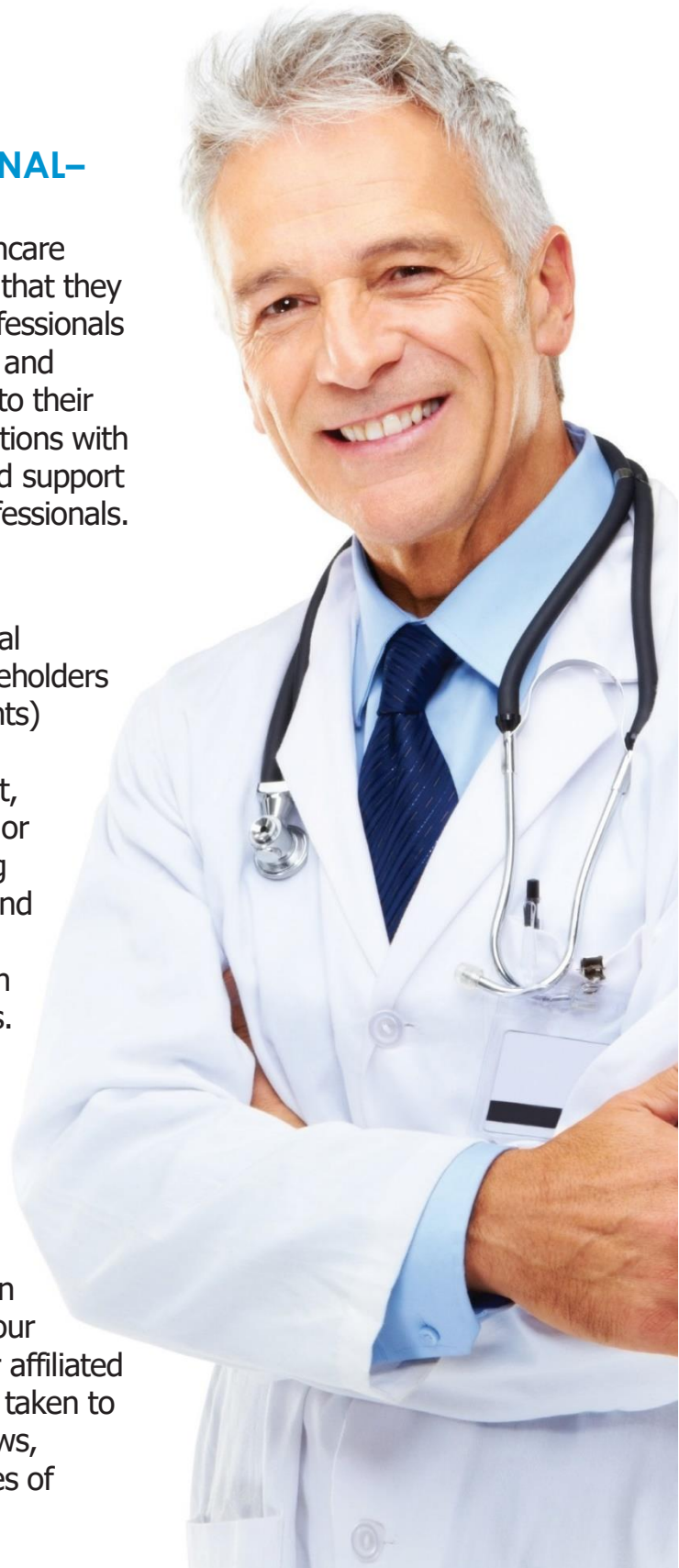
We recognize that the primary duty of practicing healthcare professionals is to their patients and to the consumers that they serve. Therefore, our relationships with healthcare professionals must support, and be consistent with, the professional and fiduciary responsibilities healthcare professionals have to their patients and to consumers. Fundamentally, our interactions with healthcare professionals must advance patient care and support ethical and compassionate practices by healthcare professionals.

CORPORATE CITIZENSHIP

Facilitating access to quality healthcare is a fundamental responsibility of governments, but, to succeed, all stakeholders (including industry, healthcare professionals and patients) must work together. We are committed to doing our part – by developing new products designed to prevent, treat, alleviate, or cure disease and disease symptoms or to otherwise support health and well-being, by working with other stakeholders to make healthcare products and information available to patients, consumers, and healthcare professionals and by supporting the creation and implementation of sustainable healthcare solutions.

TRANSPARENCY

We recognize our interactions with healthcare professionals can give rise to apparent or actual conflicts of interest. We support the disclosure of financial and other interests and relationships that may create apparent or perceived conflicts of interest in research, education or clinical practice. In addition, in our dealings with healthcare professionals employed by, or affiliated with government or regulatory authorities, care will be taken to ensure that such dealings comply with all applicable laws, regulations, professional requirements or industry codes of conduct or practice.



GLOBAL STANDARDS

MEDICAL INFORMATION COMMUNICATIONS

Pfizer's Medical Information Departments are designed to respond to inquiries from healthcare professionals and others about the use of our products. 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.

PROMOTIONAL ACTIVITIES

We promote our products to healthcare professionals by providing substantiated information about the usage, safety, effectiveness and other aspects of the profile of our products. When promoting our prescription medicines, we provide information on the medicine's benefits as well as risks. Our promotional activities with healthcare professionals must help them diagnose, treat or prevent disease or alleviate the symptoms or improve the health or well-being of the patients or consumers that they serve. In addition, our promotional materials must be accurate, substantiated, scientifically rigorous and consistent with applicable legal and regulatory standards. When describing the uses, effectiveness, safety and other aspects of our products, Pfizer colleagues, retained healthcare professionals, and other third parties working on Pfizer's behalf must take care to avoid promoting, directly or indirectly, any use that Pfizer is not permitted to promote based on applicable local laws and regulations or agreements with government agencies.



DISEASE AWARENESS COMMUNICATIONS AND CONSUMER ADVERTISING

Disease awareness communications and direct-to-consumer product advertising are designed to help patients and consumers make informed choices about their healthcare options. All of our product communications and advertising must be informative, accurate, substantiated, appropriately scientifically rigorous and consistent with applicable legal and regulatory standards.



PRIVACY OF HEALTH INFORMATION

We recognize that an individual's health information deserves to be treated with respect and sensitivity and that an individual's privacy must be protected. Pfizer generally does not obtain health data unless we have individual consent to obtain and use the information (as in the context of clinical trials) or unless 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.

PRODUCT SAMPLES

Samples of Pfizer products may be provided to healthcare professionals and, with respect to Pfizer non-prescription products, to consumers, in accordance with applicable laws. In markets where permitted, free samples of Pfizer products are provided to healthcare professionals for distribution to their patients. In addition, where permitted, free samples of Pfizer non-prescription products may be provided to consumers or healthcare professionals for their own use.

In all instances, Pfizer product samples are provided so that patients, their healthcare professionals, and/or 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, purchase or trade. Samples of prescription products may not be provided to healthcare professionals for their personal use or for any purpose other than free distribution to patients. Pfizer businesses providing samples must track and maintain records on all samples distributed.



SUPPORT FOR THIRD PARTY MEDICAL MEETINGS AND CONFERENCES

Pfizer provides funding to third party organizations to support medical education and medical conferences. The main purpose of medical congresses, conferences, symposia and similar programs supported by Pfizer must be scientific exchange and/or medical education. Such third party conferences must be held in an appropriate venue that is conducive to the main purpose of the meeting. Hospitality offered in connection with the event must be appropriate and will not include Pfizer support or organization of entertainment (e.g., sporting or leisure) events. 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 healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

Pfizer sponsorship of non-U.S. healthcare professional attendance at third party medical conferences or similar meetings is limited to support for travel, meals, accommodation and registration. In addition, Pfizer will not provide financial support for attendance by spouses or guests (unless qualified in their own right to attend).

PFIZER-HOSTED EDUCATIONAL AND/OR PROMOTIONAL MEETINGS

Pfizer-hosted educational and promotional meetings are designed to educate healthcare professionals about our products. All such meetings must be focused on education. Hospitality offered in connection with such meetings must be appropriate and will not include Pfizer-sponsored entertainment (e.g., sporting or leisure) events. Meetings should be held in appropriate venues conducive to the main purpose of the meetings and, where practical, near where the majority of the 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 as an inducement for a healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.





CONSULTANT MEETINGS AND USE OF HEALTHCARE PROFESSIONAL CONSULTANTS

Qualified healthcare professionals may be hired as consultants to provide bona fide services, such as assisting in the development of products or product claims, participating in clinical trials or other research, speaking at presentations or conferences or training Pfizer colleagues. Payments to healthcare professionals 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. Activities related to the consulting services must be the primary focus of the meeting. 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 healthcare professional, regardless of qualification, as an inducement for such healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial. Pfizer is committed to ensuring that its relationships with healthcare professionals are appropriately reviewed to ensure compliance with Pfizer policies and applicable laws.

PRACTICE-RELATED AND OTHER ITEMS

Pfizer complies 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 healthcare professionals. In markets where permitted, non-cash items related to the practice of medicine may be provided free of charge to healthcare professionals 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 healthcare professionals any item of significant value or any item as an inducement for such healthcare professional to use, prescribe, purchase or recommend a Pfizer product or to influence the outcome of a clinical trial.

EDUCATIONAL GRANTS

Pfizer provides educational grants to support bona fide independent educational programs. Pfizer supports these programs to facilitate life-long learning by healthcare professionals, ultimately to enhance patient care. 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.



CHARITABLE CONTRIBUTIONS

Pfizer provides charitable contributions in order 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.

RESEARCH GRANTS

As a research-based pharmaceutical manufacturer focused on health, Pfizer supports a broad range of research endeavors. 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, 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.

ETHICAL RESEARCH

All sponsored and supported research must be ethical in its design and implementation. We require that our sponsored clinical research conform to 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 policy on Global Clinical Trial Standards (posted at www.pfizer.com/research/research_clinical_trials/policies_positions_casestudies.jsp).

DISCLOSURE OF CLINICAL TRIAL INFORMATION

All results of Pfizer-sponsored interventional clinical trials evaluating the safety and/or efficacy of a Pfizer drug, device, or biologic product in patients are disclosed in a publicly available database. In addition, Pfizer discloses basic information about such Pfizer-sponsored studies when each trial begins. This information will be available in a public clinical trials registry. Further information about Pfizer's commitment to the disclosure of clinical trial information is available at: www.pfizer.com/research/research_clinical_trials/trial_results_research_progress.jsp.



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 consumers 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.

