



Summary of Pfizer's Anti-Bribery and Anti-Corruption Policy



Policy Overview

Pfizer's Anti-Bribery and Anti-Corruption Policy, known as "My Anti-Corruption Policy and Procedures" (MAPP), sets out Pfizer's global enterprise-wide approach to preventing bribery and corruption.

Pfizer will compete lawfully and ethically in the marketplace and expects every Pfizer Colleague and business partner to conduct all aspects of Pfizer business with integrity—including research, testing, registration, manufacturing, transportation, marketing and sales—regardless of the existence of any local customs or traditions that may call integrity into question. **Pfizer would rather lose a business opportunity than act improperly or unethically.** MAPP strictly prohibits all forms bribery and corruption, whether directly or indirectly. Employees and business partners must never offer, promise, authorize, or provide a payment or benefit that is intended to improperly influence a government official, healthcare professional, or any other person, including commercial entities and individuals, in exercising their responsibilities. **Bribery or engaging in corrupt conduct is never an acceptable business practice and will not be tolerated by Pfizer.**

MAPP includes Pfizer's corporate policy against corruption, as well as key principles and specific procedures, primarily for business interactions outside of the United States or involving non-US entities or individuals. All Pfizer Colleagues are required to comply with MAPP and failure to do so can result in disciplinary consequences, up to and including termination.

Pfizer expects its business partners to abide by Pfizer's policy and standards of ethics and integrity as set forth in Pfizer's International Anti-Bribery and Anti-Corruption Business Principles (available [here](#), translations [here](#)).

Five Guiding Principles

Pfizer Colleagues are expected to act with integrity. Acting with integrity means that every Colleague's actions must comply with applicable laws, regulations, and Pfizer policies, and must maintain Pfizer's reputation in the eyes of patients, customers, partners, and regulators. MAPP provides corporate standards that are anchored by "Five Guiding Principles."



Ensure
Legitimate
Purpose



Make
Appropriate
Expenditures



Know Our
Partners



Be
Accountable



Keep
Accurate
Records



Principle 1: Ensure Legitimate Purpose

Colleagues must never engage in any interaction or enter into any transaction that violates applicable policy, law, regulation, or industry codes, or which is made to hide an improper payment, and must never provide anything of value to anyone, including any healthcare professionals, as an improper inducement to gain a business advantage. Likewise, Colleagues must never engage vendors without a valid need for the goods or services being supplied. Colleagues must ask themselves: “Do I have a legitimate purpose for entering into this transaction?” If the answer is no, they must not proceed.

All transactions and interactions must have a legitimate purpose



Principle 2: Make Appropriate Expenditures

After confirming that the activity is for a legitimate purpose, Colleagues must ensure that every transaction is of appropriate value and that every interaction is permitted under local rules before proceeding. Pfizer only purchases legitimate, bona fide goods and services, and pay fair market value for the goods or services received. Pfizer also stays within applicable monetary limits for gifts, meals, and beverages, and only provides appropriate value in connection with travel support and external funding opportunities. **Overpaying is not only bad business, but it also potentially raises corruption risk.**



Principle 3: Know Our Partners

Pfizer only conducts business with legitimate and qualified entities and individuals. Colleagues are required to be well-informed about the individuals and entities with whom they are doing business. Before any contracts are signed or payments are made and before any third party acts on Pfizer’s behalf, Colleagues must ensure that our partners meet Pfizer’s high standards for expertise and integrity and identify any real or perceived risks associated with our business partners. Knowing our partners includes understanding healthcare professional and government official status and may also include understanding professional qualifications, employment position, and ability to influence government decisions that could impact Pfizer’s business. Collecting information enables Pfizer to assess the appropriateness of interactions and identify and manage risks.



Principle 4: Be Accountable

Every Colleague is accountable and must take ownership and responsibility for their role in Pfizer’s business activities. Being accountable means analyzing relevant information and using good judgment to stop a transaction that does or could violate the law or policy. Colleagues must also scrutinize each transaction to determine whether it creates real or perceived risks and carefully consider whether it is appropriate to move forward.



Principle 5: Keep Accurate Records

Colleagues must accurately document all transactions in sufficient detail to ensure transparency, enable informed decision-making, and establish the legitimacy of the business activity.

Summary of Anti-Corruption Policy Requirements

Bribery is Prohibited

Pfizer prohibits all forms of bribery and corruption, whether by Colleagues or our business partners. Pfizer Colleagues and business partners are prohibited from offering, promising, providing, or authorizing the provision of anything of value, whether directly or indirectly, to a government official, healthcare professional, or any other person to improperly influence the person's judgment in exercising their responsibilities and/or to obtain an advantage for Pfizer.

Whether using Pfizer funds or personal funds, Colleagues and third parties must never try to improperly secure preferential treatment or gain an improper business advantage for Pfizer and must never reward a person for taking an improper action that benefitted Pfizer.

Colleagues must comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act 2010, the anti-corruption laws of their home market and all other relevant jurisdictions (including all laws that prohibit commercial bribery or kickbacks), and all other applicable laws, consistent with the extensive Compliance resources and expertise available to Colleagues. If there are inconsistencies or conflicts among these laws or with Pfizer's policies, Colleagues must comply with the most restrictive standard. Pfizer will always compete lawfully and ethically, and it expects all Colleagues and third parties to obey the law, regardless of the existence of any local customs or traditions.

Bribery of Government Officials is Prohibited

Pfizer prohibits anyone acting on its behalf from directly or indirectly offering, promising, providing, or authorizing the provision of bribes to government officials. "Government Officials," for purposes of Pfizer's Anti-Bribery and Anti-Corruption program, refer to non-US officials and are broadly defined to cover:

- Elected or appointed officials (e.g., a legislator or a member of a government ministry);
- Individuals employed by or acting on behalf of a government agency or an institution owned or controlled by a government (e.g., a healthcare professional (HCP) employed by a government hospital or an individual serving on a healthcare committee that advises a government);
- Political party officers, political candidates, and any individuals employed by or acting on behalf of a political party or a political candidate;
- Individuals employed by or acting on behalf of a public international organization (e.g., the United Nations, the Red Cross, or the World Bank);
- Members of a military or a royal family; and
- Any additional individuals who are considered "government officials" under local laws.

As a pharmaceutical company, Pfizer must be particularly sensitive to bribery and corruption issues when government officials are involved because governments are often both the regulators of Pfizer products and major customers. In addition, in many countries outside the U.S., physicians who serve as consultants or scientists who run clinical trials may be employees of public institutions and thus considered government official.

To ensure that we know when we are interacting with individuals who are or may be Government Officials and that we adequately mitigate any associated corruption risks, Pfizer has implemented extensive **“Know Your Partner”** controls and procedures, including robust diligence and pre-approval requirements for individual engagements and interactions with HCPs and Government Officials and for external funding and third party transactions.

Commercial Bribery is Prohibited

Pfizer prohibits anyone acting on its behalf from attempting to improperly influence any member of the private sector to secure an advantage for one’s employer. To further mitigate commercial bribery and related risks, Colleagues must also follow Pfizer’s Conflicts of Interest Policy.

Examples of prohibited activities constituting Commercial Bribery include:

- Giving money or gifts to an employee of a private customer, in the hope that the employee will influence the customer to purchase Pfizer products;
- Providing a concealed incentive or commission to an employee of a private customer to improperly influence their actions; and
- Accepting or giving inappropriate gifts, hospitality, kickbacks, or investment opportunities to or from private individuals or entities doing or seeking to do business with Pfizer.

Facilitation and Extortion Payments

A Facilitation Payment is a small, unofficial payment to a GO to secure or expedite the performance of a routine governmental action. Facilitation Payments are illegal in most countries. Pfizer prohibits any Colleague or third party acting on Pfizer’s behalf from directly or indirectly offering, promising, providing, or authorizing the provision of a Facilitation Payment.

An Extortion Payment is a payment extorted by an imminent threat to the health, safety, or welfare of a Colleague or another person (such as a Colleague’s relative). Under these specific circumstances, the demanded payment may be made. Once the immediacy of the situation has been resolved, the payment must be reported to a member of the Legal Division, including information on the circumstances and amount of the payment. Any such payment must be accurately and completely recorded in Pfizer’s books and records as an Extortion Payment.

Summary of Activity-Specific Anti-Corruption Procedures

MAPP sets forth comprehensive controls and procedures that are underpinned by the Five Guiding Principles and must be followed when engaging in specific activities, with individuals and entities outside of Pfizer. MAPP controls are aligned with applicable local laws, industry association codes (e.g., IFPMA) and address the following types of activities:

- (1) Activities involving healthcare professional and government official individuals, including gifts, meals, meetings, and services arrangements. For example, MAPP prohibits the provision of customary, cash or cash equivalent gifts, personal services, to healthcare professionals and Government Officials, and prohibits the offering of leisure or social and other activities with little or no independent scientific, healthcare policy or legitimate Pfizer business-related relevance.
- (2) External funding including educational grants, corporate sponsorships, charitable contributions, and independent medical grants; and
- (3) Transactions with third parties, including entities and individuals who are not healthcare professionals or Government Officials.

Colleagues are required to follow applicable due diligence, review, pre-approval record keeping requirements, laws and local limits and other applicable local procedures in providing anything of value to an HCP or Government Official or engaging a third party for the provision of goods and services.

Colleagues are also responsible for identifying and appropriately reporting potential red flags or other compliance concerns throughout the life of a transaction or an engagement. Pfizer's Compliance Division provides resources to Colleagues concerning how to identify red flags and containing example red flags.

MAPP also requires Colleagues to assess anti-bribery risks when offering employment opportunities as well as when entering into business development transactions, with procedures in place to conduct anti-bribery and other due diligence during M&A activities in order to mitigate these risks.

Activity-based controls are supported and emphasized across the enterprise through various resources including employee and third-party trainings, standard operating procedures, contractual provisions, and in-market compliance support, and compliance with these procedures is monitored and audited.

Books and Records and Internal Controls

Pfizer is required to keep books and records that accurately and fairly reflect its transactions in reasonable detail and to maintain internal controls to prevent and detect potential violations of our policies and applicable laws.

No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately. Failing to follow or circumventing Pfizer's internal controls can result in disciplinary consequences, up to and including termination, consistent with local laws.

Pfizer also expects that any records provided by business partners to Pfizer will be accurate and include reasonable detail.

Accurate books and records allow Pfizer to conduct monitoring, auditing, and data analytics and ensure the effectiveness of our Compliance program.

Raising Concerns

Colleagues who know of or suspect a violation of the policies and procedures in MAPP are required to report that information immediately. Pfizer provides Colleagues with various mechanisms for reporting concerns, as provided in Pfizer's Code of Conduct (Blue Book), Pfizer's International Anti-Bribery and Anti-Corruption Business Principles, and related Open Door and other policies, as applicable, available to all Colleagues.

Ways to Report Concerns

Colleagues and those outside of Pfizer can also report violations by contacting the Compliance Division at:

- Email: corporate.compliance@pfizer.com
- In Person, or Via Mail:
- 66 Hudson Boulevard New York, NY 10001, USA
- In addition, compliance issues can be reported anonymously through the Pfizer Compliance Helpline at 866-866-PFIZ (or 7349) in the United States, and web reporting available at <https://pfizer.alertline.com>, subject to local privacy laws

Pfizer Colleagues are protected against retaliation. Pfizer does not tolerate any act of retaliation against anyone who seeks advice, raises a concern, reports misconduct or possible violations of law or Pfizer policies, or provides information in an investigation. This applies whether such concerns are raised internally or to appropriate authorities outside of Pfizer.