



**A Report to**

# **Pfizer Inc.**

**On Its Efforts To Promote Racial Equity,  
Diversity, and Inclusion**

**March 2024**

**COVINGTON**

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*This report reflects the views of the assessment team, which relied on data and representations provided by Pfizer's management, employees, and third parties, some of which the assessment team was not able to confirm independently. The assessment team did not investigate specific allegations regarding potential legal, regulatory, or policy violations, or audit Pfizer's financial statements. The material in this report is intended for informational purposes only, and does not constitute investment advice, a recommendation, or an offer or solicitation to purchase or sell any securities or other financial investments to any person in any jurisdiction in which an offer, solicitation, purchase, or sale would be unlawful under the securities laws of such jurisdiction.*

## I. Executive Summary

In January 2023, Pfizer Inc. (“Pfizer” or “the company”) engaged Covington & Burling LLP (“Covington”) to assess the design and implementation of the company’s three-pillar strategy for promoting racial equity, diversity, and inclusion, and to identify additional opportunities for Pfizer to strengthen these efforts. Pfizer adopted its current strategy in 2021, following public attention to racial inequality in the United States in response to the murder of George Floyd and in recognition of stark racial disparities in the effects of the COVID-19 pandemic. The 2021 strategy built upon many years of previous work within Pfizer to build and maintain an inclusive workplace culture, promote diversity and equal employment opportunity among its workforce, and support efforts to help address preexisting inequalities regarding healthcare access and social determinants of health. The 2021 strategy was organized into three pillars, reflecting Pfizer’s objectives to build a more inclusive colleague experience, advance equitable health outcomes, and transform society through external diversity, equity, and inclusion (“DEI”) partnerships.

For approximately one year, Covington worked closely with a team at Pfizer to understand the key efforts and initiatives of each pillar and identify areas for improvement. Covington concluded that Pfizer has achieved significant progress toward meeting the commitments made pursuant to each pillar. Covington also identified additional steps Pfizer could take to advance efforts to promote DEI within its workforce, help address health inequity, and better support the diverse communities it serves. These steps are summarized below.

**DEI Governance.** The assessment team reviewed Pfizer’s oversight and governance of its DEI efforts and interviewed Pfizer’s Global Chief DEI Officer (“CDO”) to learn about the company’s strategy for promoting racial equity, diversity, and inclusion. The assessment team concluded that the company has a well-functioning governance model involving senior leaders from numerous business or functional units within the company. Pfizer can further enhance its existing approach to DEI governance by expanding coordination of internal and external DEI efforts and considering further opportunities to promote accountability for continued progress in its health equity efforts.

**Workforce.** The assessment team examined Pfizer’s policies and practices impacting racial equity, diversity, and inclusion within its internal workforce. The assessment team concluded that the company has implemented robust equal employment opportunity policies and procedures, inclusive and equitable talent management initiatives, and practices that support equitable pay and comprehensive benefits for all employees. Opportunities exist to further align workplace policies to improve consistency, enhance the coordination of efforts to build a diverse and inclusive workforce, and utilize workforce data to more effectively measure progress made toward the company’s internal DEI goals.

**Health Equity.** The assessment team examined several aspects of Pfizer’s strategy to advance health equity, including promoting clinical trial diversity and inclusive research, developing and maintaining partnerships with community organizations, and supporting equitable access to patient products. The assessment team concluded that Pfizer has increased diversity in its clinical trials and made meaningful contributions to develop more inclusive clinical trials. Pfizer has supported inclusive research through its Institute of Translational Equitable Medicine (“ITEM”), which aims to gather and use data to better



understand the root causes of health inequities,<sup>1</sup> and the Global Medical Grants (“GMG”) program, which funds external research and educational initiatives.<sup>2</sup> In addition, Pfizer has built long-term relationships with community organizations through its Multicultural Health Equity Collective (“the Collective”) and the Pfizer Foundation’s Accelerating Health Equity Grants, both of which aim to address racial disparities in health outcomes.<sup>3</sup>

Pfizer has also taken significant steps to broaden access to important treatments, including for COVID-19 and cancer. Moving forward, to strengthen its existing efforts, Pfizer could consider increasing coordination and collaboration between individuals working on health equity initiatives across the company. Pfizer has opportunities to improve diversity in clinical trials, including by enhancing its use of trial data and expanding its work with community-based organizations. Pfizer can also leverage the Collective and grant programming to facilitate greater connections among member organizations, grant recipients, and the company. Finally, Pfizer should continue to develop its efforts to provide patients with access to affordable medicines.

**External Engagement.** The assessment team evaluated Pfizer’s efforts to play a positive role in the communities it serves through its external engagements. The assessment team determined that Pfizer has broadened access to opportunities to contract with the company and increased its spending with minority-owned and women-owned suppliers in recent years. Pfizer has also encouraged its employees to contribute time and money to charitable organizations based on employees’ own interests and has a donation matching program in place for employees in the United States and Puerto Rico. In addition, Pfizer has identified opportunities to leverage its capital to invest in diverse financial institutions. Moving forward, Pfizer has opportunities to explore technological solutions to expand diverse supplier engagement and solicit feedback directly from suppliers on how to improve the company’s outreach efforts. Pfizer should also continue to consider enhancements to its philanthropy efforts and continued investment in minority-owned financial institutions.

## II. Introduction

Founded in 1849 as “Charles Pfizer & Company” in Brooklyn, New York,<sup>4</sup> Pfizer today is a research-based, global biopharmaceutical company with a mission to deliver medical “breakthroughs that change patients’ lives.”<sup>5</sup> Pfizer produces a variety of medicines and vaccines, including medications for rheumatoid arthritis, cardiovascular disease, cancer treatments, and dermatological conditions, as well as a vaccine to protect against COVID-19, and an oral medication to treat mild-to-moderate COVID-19 in patients at high risk for

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<sup>1</sup> Pfizer, *Pfizer 2021 ESG Report* (2021) at 24, [https://www.pfizer.com/sites/default/files/investors/financial\\_reports/annual\\_reports/2021/files/Pfizer\\_ESG\\_Report.pdf#page=24](https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2021/files/Pfizer_ESG_Report.pdf#page=24) [hereinafter “2021 ESG Report”].

<sup>2</sup> Pfizer, *Pfizer Global Medical Grants*, [https://www.pfizeroncologycongresshub.com/files/Pfizer\\_GMG-External-Brochure\\_ENG-DIGITAL-Appendix.pdf](https://www.pfizeroncologycongresshub.com/files/Pfizer_GMG-External-Brochure_ENG-DIGITAL-Appendix.pdf) (last visited Mar. 11, 2024).

<sup>3</sup> Pfizer, *Pfizer Multicultural Health Equity Collective*, [https://cdn.pfizer.com/pfizercom/The\\_Collective\\_One\\_Pager\\_Final\\_11292023.pdf](https://cdn.pfizer.com/pfizercom/The_Collective_One_Pager_Final_11292023.pdf) (last visited Mar. 11, 2024); 2021 ESG Report at 35.

<sup>4</sup> Pfizer, *Company Timeline: a Legacy of Innovation*, <https://www.pfizer.com/about/history> (last visited Mar. 11, 2024).

<sup>5</sup> Pfizer, *Innovating to Bring Important New Therapies to Patients*, <https://www.pfizer.com/science/research-development/breakthroughs> (last visited Mar. 11, 2024).

progression to severe COVID-19.<sup>6</sup> Pfizer is one of the largest biopharmaceutical companies in the world, with products sold in approximately 200 countries and territories, and medicines and vaccines used to treat millions of patients worldwide.<sup>7</sup> Pfizer employs approximately 88,000 employees around the globe, with approximately 35,000 based in the United States.<sup>8</sup> Further, “women compose approximately 52% of [Pfizer’s] global workforce, and approximately 39% of [Pfizer’s] U.S.-based employees are individuals with ethnically diverse backgrounds.”<sup>9</sup> Pfizer employees work in a variety of functions, including Corporate Affairs; Legal; Compliance; Digital and Technology; Finance; People Experience; Global Supply; U.S. Commercial; International Commercial; Research and Development; and Oncology.

In early 2023, Pfizer engaged Covington & Burling LLP to assess Pfizer’s efforts to promote racial equity, diversity, and inclusion in the United States, both within Pfizer’s business and in the communities it serves. Over the course of a year, an assessment team led by former Attorney General Eric. H. Holder, Jr. worked closely with Pfizer’s Global DEI team and others at the company to learn about Pfizer’s three-pillar DEI strategy, assess its commitments to racial and health equity, and recommend steps where the company’s strategies or policies could be strengthened. This report contains the results of Covington’s assessment. The report begins with a description of the methodology the Covington team used to conduct the assessment. It then provides an overview of Pfizer’s DEI strategy and governance structure and related observations and considerations, followed by a summary of the main themes from Covington’s discussions with civil rights and advocacy organizations. The report next discusses each of the three pillars of Pfizer’s DEI strategy, including the pillar-specific objectives and related initiatives, and offers observations and considerations for each of these objectives.

### III. Methodology

Pfizer engaged Covington to conduct an objective assessment of the company’s commitments and efforts to promote racial equity, diversity, and inclusion and to develop recommendations for enhancing those efforts where warranted. The assessment team focused on Pfizer’s policies, programs, and initiatives in the United States related to its workforce, its business operations, and the communities the company serves. Specifically, the assessment team sought to answer four questions:

- **Commitments:** What internal and external commitments or efforts has Pfizer undertaken to promote racial equity, diversity, and inclusion with respect to its workforce, its patients, and the communities it serves?
- **Implementation:** What progress has Pfizer made toward those commitments, and has Pfizer encountered any barriers to implementation?

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<sup>6</sup> Pfizer, *Our Purpose*, <https://www.pfizer.com/about/purpose> (last visited Mar. 11, 2024); Pfizer, *Product Listings*, <https://www.pfizer.com/products> (last visited Mar. 11, 2024).

<sup>7</sup> Pfizer, *Why Invest*, <https://investors.pfizer.com/Investors/Why-Invest> (last visited Mar. 11, 2024); Pfizer, *Annual Report (Form 10-K)* (Feb. 22, 2024) at 6, <https://d18rnop25nwr6d.cloudfront.net/CIK-0000078003/1447e045-6320-4de3-a603-248c700cf342.pdf#page=14> (last visited Mar. 11, 2024).

<sup>8</sup> Annual Report (Form 10-K), *supra* note 7, at 15.

<sup>9</sup> *Id.*

- **Integration:** What steps has Pfizer taken to institutionalize the objectives underlying its racial equity, diversity, and inclusion commitments into its business?
- **Recommendations:** What additional steps could Pfizer take to fulfill its commitments to racial equity, diversity, and inclusion, make those commitments more effective, or help Pfizer become a more equitable and inclusive company, both for Pfizer’s workforce and the patients and communities Pfizer serves?

The assessment team reviewed information related to Pfizer’s DEI strategy and governance structure, Pfizer’s efforts to implement its DEI-related goals and evaluate progress towards them, and investment by Pfizer’s leadership in the company’s overall racial equity, diversity, and inclusion efforts. The assessment team’s work consisted of document and data review, interviews with company subject matter experts, and engagement with various external stakeholders.

Specifically, the assessment team:

- Reviewed publicly available information and documents provided by Pfizer, including: (i) key metrics and dashboards expressing Pfizer’s commitments to goals set under its global DEI strategy; (ii) corporate policies and procedures; (iii) summaries of employee survey results; (iv) internal reports and dashboards discussing Pfizer’s progress toward its goals; (v) summaries of Pfizer’s initiatives and partnerships with health organizations; and (vi) research-driven analyses of prevalent health disparities.
- Conducted interviews with dozens of individuals responsible for overseeing aspects of Pfizer’s DEI strategy. The assessment team spoke with internal subject matter experts regarding Pfizer’s approach to DEI governance and accountability; policies and practices related to equal employment opportunity, talent recruitment and acquisition, Enterprise Colleague Resource Groups (“ECRGs”), benefits, pay equity, workplace investigations, and professional development; clinical trial diversity; access to medicines; patient advocacy initiatives; efforts to increase supplier diversity programs and foster employees’ commitments to charitable organizations; and financial investments.
- Attended meetings with Pfizer’s DEI Board, which manages the implementation of Pfizer’s DEI strategy, and the annual DEI Summit, which provided Pfizer employees with updates on progress made toward achieving key DEI initiatives.
- Organized a roundtable conducted by former Attorney General Holder with civil rights organizations and community health groups for the purpose of obtaining their perspectives on Pfizer’s commitments to racial equity, including recommendations for enhancement, which are discussed more fully in the following sections of this report. After the roundtable, the assessment team held additional one-on-one conversations with several organizations that were unable to attend the roundtable.
- Conducted interviews with many member organizations that are part of Pfizer’s Multicultural Advisory Council (“PMAC”), which helps lead the work of the Collective, a group focused on helping to improve health equity across ethnic groups and other underrepresented communities facing significant health disparities.
- Conducted interviews with several organizations that received a grant through the Accelerating Health Equity Grant program, which the Pfizer Foundation launched in

2020 to support efforts to reduce health disparities and improve health outcomes in Black communities in the United States.

#### **IV. Engagement with Civil Rights and Advocacy Organizations**

Covington and Pfizer invited several civil rights organizations and community organizations to join a roundtable discussion led by former Attorney General Holder in May 2023 at Covington's offices in Washington, D.C. Covington also held one-on-one discussions with several organizations that were invited but could not attend the May 2023 meeting. Those discussions took place between August and October 2023. The listening session and one-on-one discussions had several objectives, including: (i) providing an overview of Pfizer's three-pillar DEI strategy; (ii) soliciting the perspectives of the attendee organizations regarding Pfizer's DEI strategy and efforts to promote racial equity in the United States; and (iii) discussing suggestions participants had for additional steps Pfizer might take to fulfill and expand its DEI commitments.

Participants in the listening session and in additional one-on-one discussions with Covington provided feedback addressing the following primary themes:

- Corporate leadership has a critical role to play in DEI efforts, including by making the business case for DEI, and companies should implement incentives for executives to meet DEI goals, such as bonus compensation, for this purpose.
- Participants praised Pfizer for its development of the Pfizer-BioNTech COVID-19 vaccine and promotion of clinical trial diversity during the COVID-19 pandemic but stated that Pfizer and other pharmaceutical companies still have opportunities to commit to further promoting clinical trial diversity.
- Pfizer and other companies in the industry could strengthen efforts to support local health organizations, including through community partnerships, and build longer-term relationships with those organizations.
- Pfizer and other pharmaceutical companies should continue focusing on expanding supplier diversity efforts.

Participants also provided feedback on their experiences and observations with successful DEI and governance models. One participant encouraged Pfizer to consider simplifying its governance model to allow for individual business lines to implement their own strategies for promoting racial diversity. Several participants suggested that Pfizer consider ongoing engagement with external experts, such as through an advisory council, as a vehicle to further enhance the company's engagement efforts. Some participants urged Pfizer to continue considering the elimination of a four-year degree requirement across all hiring practices, which Pfizer has done for open roles at certain grade levels.

#### **V. DEI Governance and Strategy**

##### **A. Governance Structure**

The Pfizer Board of Directors ("the Board") oversees the company's corporate strategy, including significant business and organizational initiatives, capital allocation priorities, and potential value-enhancing business development opportunities (including acquisitions, licenses,



and collaborations) intended to support Pfizer’s strategy.<sup>10</sup> The Board is also engaged in and responsible for oversight of Pfizer’s Environmental, Social, and Governance (“ESG”) program, which includes the company’s DEI strategy.<sup>11</sup> The Board’s Governance & Sustainability Committee primarily oversees Pfizer’s ESG strategy and human capital management policies and practices, and partners with the Compensation Committee to oversee Pfizer’s policies related to DEI, including pay equity, recruitment, retention, professional development, and succession planning.<sup>12</sup> Senior leaders regularly provide updates on Pfizer’s ESG priorities—including DEI initiatives, key metrics, and future goals—to the Governance & Sustainability Committee.<sup>13</sup> In addition, the Audit Committee receives briefings on company culture and risks associated with compliance concerns, workplace behavior, and harassment and retaliation.<sup>14</sup>

## **B. Pfizer’s DEI Strategy**

Pfizer first developed a formal DEI strategy in 2005,<sup>15</sup> hiring its first Chief Diversity Officer in 2008.<sup>16</sup> Pfizer updated its approach to DEI in 2021, after the company hired a new CDO.<sup>17</sup> The CDO worked with a group of company leaders—including members of the Executive Leadership Team (“ELT”) and Pfizer’s DEI Board—to evaluate Pfizer’s DEI strategy and identify areas for improvement.<sup>18</sup> Following this review, the group determined that the company could do more to promote a culture of inclusion for underrepresented communities within its workforce and in the communities it serves, including by addressing the underrepresentation of racial and ethnic communities within the workforce, and supporting equitable health outcomes for patients by conducting inclusive research and removing barriers to access.<sup>19</sup> The group also concluded that the company would benefit from a centralized governance structure to track and assess the impact of Pfizer’s DEI initiatives. To address these issues, the company updated its strategy in 2021 with the goal of establishing a comprehensive governance model that could more effectively integrate, track, and measure

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<sup>10</sup> Pfizer, *Proxy Statement for 2023 Annual Meeting of Shareholders* at 2, [https://s28.q4cdn.com/781576035/files/doc\\_financials/2023/sr/interactive\\_proxy/images/Pfizer-Proxy2023.pdf#page=10](https://s28.q4cdn.com/781576035/files/doc_financials/2023/sr/interactive_proxy/images/Pfizer-Proxy2023.pdf#page=10) (last visited Mar. 11, 2024) [hereinafter “2023 Proxy Statement”].

<sup>11</sup> *Id.* at iv, 3; Pfizer, *Pfizer 2022 ESG Report* (2022) at 47, [https://www.pfizer.com/sites/default/files/investors/financial\\_reports/annual\\_reports/2022/files/Pfizer\\_ESG\\_Report.pdf#page=47](https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2022/files/Pfizer_ESG_Report.pdf#page=47) [hereinafter “2022 ESG Report”].

<sup>12</sup> 2023 Proxy Statement at 3; 2022 ESG Report at 47.

<sup>13</sup> 2023 Proxy Statement at 3.

<sup>14</sup> 2022 ESG Report at 47.

<sup>15</sup> Pfizer, *Pfizer 2005 Annual Review* (2005) at 26, [https://s28.q4cdn.com/781576035/files/doc\\_financials/2005/AR/review2005.pdf#page=28](https://s28.q4cdn.com/781576035/files/doc_financials/2005/AR/review2005.pdf#page=28).

<sup>16</sup> NAACP, *Karen Boykin-Towns*, <https://naacp.org/people/karen-boykin-towns> (last visited Mar. 11, 2024).

<sup>17</sup> Pfizer, *Ramcess Jean-Louis Is Ready to Build on Pfizer’s Longtime Commitment to Diversity, Equity, and Inclusion*, [https://www.pfizer.com/news/articles/ramcess\\_jean\\_louis\\_is\\_ready\\_to\\_build\\_on\\_pfizer\\_s\\_longtime\\_commitment\\_to\\_diversity\\_equity\\_and\\_inclusion](https://www.pfizer.com/news/articles/ramcess_jean_louis_is_ready_to_build_on_pfizer_s_longtime_commitment_to_diversity_equity_and_inclusion) (last visited Mar. 11, 2024).

<sup>18</sup> 2021 ESG Report at 23.

<sup>19</sup> Pfizer, *Pfizer 2021 Annual Review* (2021) at 46, [https://www.pfizer.com/sites/default/files/investors/financial\\_reports/annual\\_reports/2021/files/Pfizer\\_Annual\\_Review.pdf#page=46](https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2021/files/Pfizer_Annual_Review.pdf#page=46) [hereinafter “2021 Annual Review”]; 2021 ESG Report at 18, 23.

progress on DEI efforts across all of the company's business or functional units.<sup>20</sup> Pfizer's 2021 DEI Strategy organized its new and existing DEI priorities and initiatives into three overarching pillars. Each pillar includes two or three key priorities, supported by key initiatives and related metrics for evaluating the company's progress. The pillars are summarized below.

- **Pillar 1:** Building a more inclusive colleague experience. Pillar 1 priorities include increasing diversity across the company and fostering a sense of belonging by connecting colleagues.
- **Pillar 2:** Advancing equitable health outcomes. Pillar 2 priorities include conducting inclusive research, improving health outcomes by focusing resources on disease drivers that disproportionately impact underserved populations, and removing barriers to resources by increasing access and affordability for patients in historically underserved communities.
- **Pillar 3:** Transforming society through external partnerships. Pillar 3 priorities include enhancing work with diverse suppliers and business partners and contributing towards a more equitable society through partnerships with other organizations advancing health equity.

### **C. Oversight of DEI at Pfizer**

Pfizer's CDO is responsible for developing and implementing Pfizer's DEI strategy across the company.<sup>21</sup> The CDO is supported by a team of employees who focus exclusively on the enterprise DEI strategy, and employees with both business and DEI responsibilities who customize enterprise DEI efforts for business or functional units across Pfizer. Pfizer's CDO reports to the Chief People Experience Officer, a member of the ELT, and communicates directly with Pfizer's CEO monthly. The CDO also presents updates to the Board's Governance & Sustainability Committee regarding progress against the company's DEI strategy, as well as potential challenges or roadblocks and how to address them.

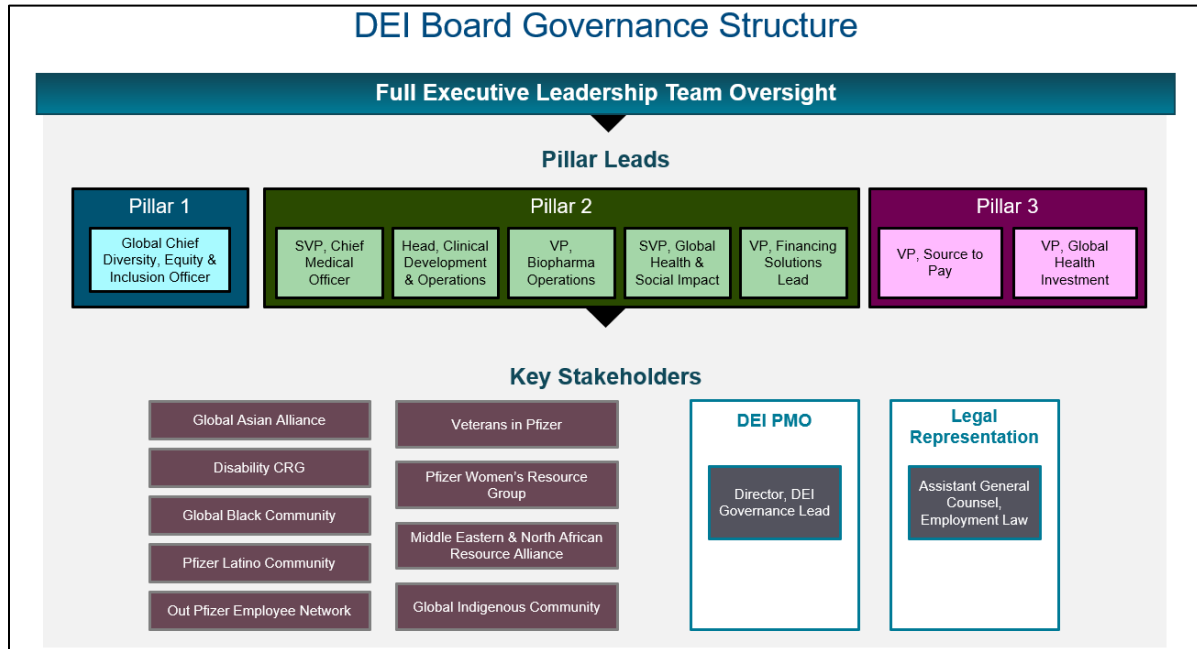
Pfizer established an internal, enterprise-wide DEI Board in 2021 to help manage the implementation of the DEI strategy. The DEI Board consists of pillar leads, DEI team leads, and other key stakeholders. Pillar leads are responsible for managing elements of the three pillars of Pfizer's DEI strategy. Specifically, each pillar of the DEI strategy is led by one or more Pfizer executives with direct oversight over the departments responsible for the initiatives within that pillar. Pillar 1 is led by the CDO; Pillar 2 is led by five senior leaders, including the Chief Medical Officer, the Vice President ("VP") of Biopharma Operations, and the Senior VP of Global Health & Social Impact; and Pillar 3 is led by the VP of Source to Pay and the VP of Global Health Investment. Other key members of the Enterprise DEI Board include representatives from Pfizer's ECRGs, Legal, and DEI Governance teams. The DEI Board meets twice per year to define priorities and outcome metrics for each pillar team, share progress against pillar-specific goals, and discuss any potential roadblocks. During both meetings, the pillar teams provide updates regarding their pillar-specific initiatives and seek

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<sup>20</sup> Pfizer, *Embedding DEI into Our Purpose*, [https://www.pfizer.com/sites/default/files/investors/financial\\_reports/annual\\_reports/2021/story/embedding-dei-into-our-purpose/](https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2021/story/embedding-dei-into-our-purpose/) (last visited Mar. 11, 2024); 2021 Annual Review at 46.

<sup>21</sup> The CDO is not a member of the Executive Leadership Team.

input regarding how the team could more effectively advance Pfizer’s DEI goals. The CDO then reports on the DEI Board’s progress to the ELT.



The DEI Board works with the pillar teams and ECRGs to implement Pfizer’s DEI strategy. Individual pillar teams work with various business or functional units within the company to communicate DEI priorities and implement racial and health equity initiatives. The ECRGs work with Regional DEI Councils and Regional/Local Colleague Resource Groups (“CRGs”) to surface ideas, share location-specific priorities and activities, and translate the broader DEI vision into custom initiatives of local importance. In addition, as described below, Pfizer hosts an annual Summit to update workforce members on progress toward the company’s DEI goals.

Pfizer’s full ELT oversees the DEI Board. The ELT works with the DEI Board to develop high-level strategy and establish accountability mechanisms to drive progress. Beginning in 2022, Pfizer’s Executive Compensation program began linking short-term incentive bonuses in part to performance against an ESG scorecard that includes metrics related to the 2021 strategy, such as diverse representation at the VP+ level and Pfizer’s greenhouse gas emissions.<sup>22</sup>

<sup>22</sup> 2023 Proxy Statement at 42, 48.

## Recommendations

- Consider strategies for empowering the DEI Board to expand coordination of internal and external DEI efforts. For example, Pfizer may consider implementing longer DEI Board meetings or more frequent touch points among the pillar leads, which would enable participating company leaders to further refine strategies to drive progress toward Pfizer’s DEI goals, make additional connections across the various DEI initiatives, and share recommendations for further improvement.
- Consider opportunities to promote accountability for continued progress with respect to Pfizer’s efforts to promote health equity, for example, by considering progress towards the company’s health equity goals as part of the performance evaluation process.

## VI. Pillar 1: Build a More Inclusive Colleague Experience

Before implementing a new DEI strategy in 2021, company leaders determined that Pfizer could strengthen internal efforts to promote a culture of inclusion and address the underrepresentation of diverse communities within the workforce, particularly in leadership roles.<sup>23</sup> Therefore, Pillar 1 of Pfizer’s updated DEI strategy establishes a commitment to “improving diversity and fostering belonging for all colleagues across the talent lifecycle.”<sup>24</sup> For Pfizer, this commitment focuses on the development of meaningful connections among employees, reducing barriers to equity in the workplace, and establishing a culture that celebrates everyone. Pfizer publicly stated that it embraces the goal of maintaining a “best-in-class organization that embeds diversity, equity, and inclusion (DEI) into [the] workplace” through defined standards, clear governance, and measurable outcomes.<sup>25</sup>

The assessment team evaluated Pfizer’s efforts across four areas, including efforts to: (i) provide a safe and respectful workplace, including through related policies and procedures; (ii) strengthen inclusive hiring practices that promote diversity throughout the company; (iii) foster an inclusive and supportive work environment for all employees; and (iv) offer equitable and inclusive pay and benefits.

### A. Workplace Policies, Procedures, and Trainings

#### 1. EEO Policies and Trainings

Pfizer has implemented robust workplace policies and procedures that reinforce the company’s commitment to fostering a respectful and equitable working environment free of discrimination, harassment, and retaliation. The company primarily addresses these topics in its Code of Conduct, Equal Opportunity Policy (“the EEO Policy”) and its Discrimination, Harassment, and Retaliation Prevention Policy (“the Discrimination Policy”).

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<sup>23</sup> 2021 Annual Review at 46; 2021 ESG Report at 18.

<sup>24</sup> 2021 ESG Report at 23.

<sup>25</sup> *Id.*

Pfizer's Code of Conduct, known as the "Blue Book," establishes equity as a core company value.<sup>26</sup> The Blue Book contains clear provisions that prohibit discrimination, harassment, and retaliation, and state Pfizer's commitment to fostering a diverse, equitable, and inclusive workplace.<sup>27</sup> The Blue Book contains references to relevant policies and reiterates Pfizer's expectation that employees contribute to establishing a respectful, positive, and productive work environment.<sup>28</sup> Pfizer sends the Blue Book to all new hires and asks them to certify that they have read and reviewed it within the first few days of employment. Employees must re-certify their awareness and understanding of the Blue Book every two years.

The EEO Policy contains a clear overview of Pfizer's EEO commitments and describes the company's prohibition on both harassment and other forms of disrespectful treatment. The Discrimination Policy includes clear definitions of discrimination, harassment, and retaliation and also reinforces the broad scope of conduct that Pfizer prohibits in the workplace, including harassment and other forms of disrespectful treatment. The EEO Policy does not refer to the Discrimination Policy, and the definitions of harassment, discrimination, and retaliation, as well as lists of protected characteristics, vary slightly between policies.

Employees must take annual anti-harassment and bi-annual Blue Book training. Managers receive a separate anti-harassment training that focuses on their responsibility to recognize and escalate potential policy violations. Pfizer also offers mandatory training on conscious inclusion and optional trainings on additional topics such as unconscious bias and allyship. Pfizer's learning management system sends automatic reminders to employees if they have not yet completed a mandatory training. If an employee fails to take a training in the required timeframe, the employee's manager receives a notification. If the employee still does not take the required training, the employee may face disciplinary action.

## **2. Reporting Misconduct**

Pfizer's Open Door Policy describes procedures that employees can use to report misconduct. Pfizer's EEO Policy, Discrimination Policy, and Blue Book each contain provisions explaining how employees may report discrimination, harassment, retaliation, and related inappropriate conduct, and they all refer to the Open Door Policy for more information. The Open Door Policy itself does not contain any specific provision on reporting discrimination or harassment. The policies are largely consistent but contain some small variations, including slightly differing lists of reporting channels.

Pfizer's Blue Book training includes modules on how employees can report complaints of discrimination, harassment, retaliation, or other inappropriate conduct. Pfizer requires managers to take the Duty to Act training, which informs them of their responsibilities to report complaints to the appropriate team at Pfizer for investigation and resolution.

Pfizer measures employees' awareness of company reporting policies and their comfort levels in raising concerns through the annual Pulse survey. Pfizer uses the results to identify

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<sup>26</sup> Pfizer, *Blue Book: Pfizer's Code of Conduct* (2023) at 5, [https://cdn.pfizer.com/pfizercom/investors/corporate/Pfizer\\_2023BlueBook\\_English\\_v5\\_02272024.pdf#page=5](https://cdn.pfizer.com/pfizercom/investors/corporate/Pfizer_2023BlueBook_English_v5_02272024.pdf#page=5).

<sup>27</sup> *Id.* at 31–32.

<sup>28</sup> *Id.* at 28.



trends and tailor communications, training, and other efforts to encourage reporting.<sup>29</sup> The 2023 results establish that the vast majority of survey participants agreed that they are aware of Pfizer's Open Door Policy, they know how to report concerns, and they can report misconduct without fear of reprisal. Managers can review the aggregated survey results for their teams, and human resources leads, which Pfizer refers to as People Experience ("PX") leads, can review the aggregated survey results for the business or functional unit that they oversee. Certain members of the PX team also can disaggregate the data to analyze the survey results by demographic characteristics. The Employee Relations ("ER") team, which is responsible for reviewing and investigating workplace complaints, does not have access to the aggregated or disaggregated survey data related to employee awareness of reporting policies and procedures.

The ER team has recently taken several steps to expand employee awareness of Pfizer's reporting policies and procedures. In 2021, Pfizer transitioned from its intranet site to a platform called Fuse. At that time, the ER team used Google optimization to promote ready access to its content. For example, when an employee uses search terms commonly associated with the ER process (e.g., "complaint" or "report"), the results bring the employee to the ER landing page, which includes information on reporting channels, the kinds of complaints the ER team investigates, the investigations process, and guidance for managers on how to report and address policy violations.

### **3. Responding to Misconduct**

Pfizer follows a consistent process for responding to employee complaints. Pfizer's ER team receives all workplace complaints in the first instance and determines which team the complaint should be routed to for further review. The ER team handles complaints involving discrimination, harassment, retaliation, or similar disrespectful conduct. The ER team also partners with the DEI team to address complaints regarding DEI programs or events. The ER team reviews all new complaints against the internal complaint database to understand any relevant history and assign the appropriate investigator, drawing on experience with the issue, prior knowledge of the complainant or subject, and current bandwidth to make that choice. After conducting interviews and reviewing relevant documents, the investigator will draft a report outlining the allegations and the facts learned from the investigation.

Investigators have access to enterprise-wide DEI training on topics such as unconscious bias. The ER team is not required to take investigator-specific training regarding how to address bias during the investigations process. Information on what to expect from the investigative process is available to employees on the Fuse site through FAQs and educational one-pagers. Pfizer's policies, including the Open Door Policy, do not describe this process.

Following an investigation, the ER team proposes a disciplinary outcome, if warranted, which the team leaders of the employees involved must approve. The ER team meets weekly to discuss ongoing investigations in order to calibrate disciplinary actions and maintain consistency. The ER team also assesses any potential disciplinary action against its complaint database to confirm that the discipline aligns with similar substantiated complaints. Pfizer provides a reference guide to managers that describes the types of disciplinary outcomes that may result from misconduct, although the guidelines do not dictate the type of discipline that must be implemented for a particular substantiated complaint.

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<sup>29</sup> 2022 ESG Report at 39.

Pfizer does not maintain a formal process for employees to appeal the findings of an investigation or challenge disciplinary action. If an employee raises a concern regarding the resolution of an investigation, the ER team lead will review the complaint and findings to determine whether the investigator reached an appropriate outcome, implementing remediation as needed.

The ER team reminds employees who have participated in an investigation of Pfizer's anti-retaliation policy during and after the completion of an investigation. Following an investigation, Pfizer does not formally solicit participant feedback on the complaint or investigations process. The ER investigator may periodically check in with the complainant on an ad-hoc basis to confirm that they have not experienced any retaliatory behaviors. Alternatively, the investigator may engage in a "purposeful handoff" with the PX team to conduct these periodic check-ins. For substantiated complaints, the ER investigator will contact the complainant's manager to remind them of Pfizer's anti-retaliation policy and provide them with guidance on how best to support the employee moving forward. For unsubstantiated complaints, the ER investigator may continue to work with the complainant informally to ensure that they feel comfortable in their role, which could include helping them transition to another team. Regardless of the outcome of an investigation, employees can also speak with the Office of the Ombuds—a neutral, confidential, and off-the-record resource—regarding any concerns that arise following an investigation. For example, the Office of the Ombuds offers voluntary "Facilitated Discussions" to assist employees who have participated in an investigation to come to an agreement regarding how they will work together professionally and respectfully moving forward.

#### **4. Tracking Complaints and Investigations**

The ER team tracks data on the number of complaints received, substantiated, and resulting in discipline. The ER team can disaggregate this data by business or functional unit and location. It does not currently disaggregate complaint-related data by racial or ethnic demographic information.

The ER team runs reports on complaint-related data on an ad-hoc basis. Recently, the ER team has run reports for the Board of Directors that provide various analyses of workplace reporting, including information reflecting the most commonly used channels for complaints, most frequent types of complaints reported, case dispositions, and disciplinary actions. The ER team has updated its data-reporting capabilities in order to run reports more regularly.

## Recommendations

- As part of Pfizer's regular process of reviewing and revising workplace policies, consider conducting a side-by-side policy review to further enhance consistency and ensure policies that may inform one another are clearly linked, for example, by referencing Pfizer's policies on discrimination and harassment directly in the Open Door policy.
- Consider enhancements to the complaint reporting, investigation, and resolution process, such as ensuring investigators complete investigator-specific unconscious bias or other DEI-related training, instructing investigators to monitor for retaliation using a clearly defined and standardized process, or soliciting aggregated feedback from employees who participate in investigations regarding their experience with the process.
- Consider additional strategies for the use of data in support of workplace EEO commitments. For example, Pfizer could consider analyzing complaint-related data by demographic categories to identify and address trends.

### **B. Inclusive Hiring Practices**

#### **1. Cultivating a Diverse and Inclusive Applicant Pool**

Pfizer's Candidate Experience team works with over 35 civil rights, community, and national affinity organizations to expand Pfizer's talent pools and increase awareness within underrepresented communities of open roles at Pfizer in order to promote equal employment opportunity. Pfizer also uses Handshake—a third-party, online recruiting platform for higher education students and alumni—to connect directly with Historically Black Colleges and Universities ("HBCUs") and Hispanic Serving Institutions ("HSIs"). To assess the efficacy of Pfizer's current partnerships and programs, the company manually tracks and collects data on how applicants became aware of open positions. Through these partnerships, Pfizer completed more than 600 interviews at DEI-focused career fairs and added more than 3,000 candidates to its talent database in 2023.

Pfizer seeks to strengthen its external partnerships with HBCUs and HSIs and plans to incorporate additional HBCUs and HSIs into its campus recruiting strategy moving forward. To centralize Pfizer's outreach efforts, the Early Talent team is also in the process of assigning dedicated resources to manage existing and new relationships with HBCUs and HSIs because Pfizer's various business or functional units do not currently have a standard practice for coordinating outreach initiatives.

The Candidate Experience team provides guidance to hiring managers on how to write effective and inclusive job postings that minimize bias in the hiring process. Hiring managers are encouraged, but not required to, use the guidance. To further educate hiring managers on how to write inclusive job descriptions, Pfizer provides hiring managers with access to Blueprint, a tool that illustrates how changes to a job description can alter and expand the diversity of a candidate pool.

Pfizer regularly assesses opportunities to further strengthen inclusive language in job postings. For example, Pfizer recently modified its requisition template in Workday to remove language in job postings stating that an internal candidate has been identified for an open role. While this practice had been common in the past, the Candidate Experience team concluded that it significantly limited applicant pools.

## **2. Diverse Candidate Slates and Interview Panels**

In 2022, Pfizer implemented mandatory requirements for including a diverse group of applicants on interview slates (the group of candidates being interviewed for open roles) and ensuring that applicants interview with a diverse panel of Pfizer interviewers for all U.S. job requisitions. Pfizer considers a candidate slate or interview panel to be diverse if it includes at least one ethnically diverse individual and at least two genders are represented. This requirement cannot be fulfilled by the same person.

Before making a selection decision, hiring managers must complete a survey confirming whether the candidate slate and interview panel diversity requirements have been met, based on aggregated, voluntarily disclosed demographic data. An offer cannot be generated until the hiring manager completes the survey and the recruiter reviews the survey responses for compliance. If the hiring manager indicates that either the interview panel or the candidate slate did not comply with the requirement, they must provide a reason and context for why this occurred. The recruiter may work with the PX team to determine whether an exception can be applied for the noncompliance or if the hiring team needs to identify additional candidates and conduct more interviews. Candidates are not removed from a slate to meet requirements, only added. Recruiters do not independently verify hiring managers' responses, though Pfizer tracks completion of the survey. Most workforce members comply with the survey, but results indicate that some offers are extended without full completion of the survey or review by a Pfizer recruiter.

## **3. Interviews and Evaluation**

In addition to establishing diverse candidate slates and interview panels, Pfizer asks hiring managers to generate a list of standardized interview questions to share with the rest of the interview panel and ask during each interview to minimize bias. No mechanism is in place to ensure hiring managers follow these guidelines. The Candidate Experience team also encourages interview panels to assess each candidate using Pfizer's Candidate Evaluation Tool. The Candidate Evaluation Tool enables the interview panel to agree on a standardized list of evaluation criteria—such as the company's values, the key experience needed for the role, and job-specific required skills—before interviewing and assessing candidates to focus the evaluation on objective criteria. The Candidate Experience team provides interview panels with guidance on how to use the Candidate Evaluation Tool to facilitate a fair and equitable selection process. Following each interview, the hiring manager holds a debrief conversation with the panel to discuss the candidate and align on feedback to provide to the recruiter.

## **4. Resources for Hiring Managers and Recruiters**

Pfizer provides DEI-related training to both recruiters and hiring managers. Training for recruiters includes modules that cover recruiters' specific DEI-related responsibilities during the hiring process, such as tracking the aggregate diversity of the candidate pool and assisting the hiring manager in identifying a diverse interview panel. Pfizer also offers a Hiring Manager Toolkit, available on Pfizer's intranet and accessible to all managers. The Toolkit houses all

support materials related to a hiring manager’s role in Pfizer’s recruitment and hiring process, including how they can reinforce inclusive hiring practices and promote diversity and equity in recruitment.

## Recommendations

- Continue advancing efforts to expand Pfizer’s talent pool. For example, Pfizer should consider enhancing coordination of efforts to manage existing and new relationships with HBCUs and HSIs and equip those overseeing such efforts with the support needed to promote progress on the company’s goals.
- Explore whether Pfizer can strengthen accountability measures to enhance and build upon adoption of Pfizer’s diverse candidate slate and interview panel requirements among hiring teams, such as including an additional verification step for recruiters to certify compliance and enhancing tracking capabilities to understand any trends in non-compliance.
- Consider additional strategies for encouraging hiring managers to use the Blueprint tool, standardized interview questions, and the Candidate Evaluation Tool where appropriate throughout the hiring process to reinforce objective candidate assessment and mitigate the potential for bias.

## C. Fostering an Inclusive Work Environment for All Employees

### 1. Professional Development

Pfizer launched its Global Growth and Talent strategy in 2021, which aims to strengthen employee engagement, productivity, and overall job satisfaction by providing employees with opportunities for learning, skill-building, and growth. Pfizer is committed to promoting inclusivity and equitable access to professional development across its workforce by implementing common language around growth and supporting employee exploration in all parts of the business.<sup>30</sup> In 2021, Pfizer began shifting from a traditional, linear view of career growth to a “zig-zag” model—or “a fluid process that promotes incremental in-role growth or mobility along horizontal, vertical, or diagonal individualized pathways.”<sup>31</sup> As part of promoting zig-zag career growth, Pfizer provides employees with the opportunity to participate in Growth Gigs, which are part-time or temporary secondment opportunities to learn about and develop skills in another functional area within Pfizer’s business. Pfizer also promotes diagonal career moves by encouraging employees to pursue new roles in different job functions to gain a more holistic understanding of the company and by providing growth opportunities to a broad range of employees.

Pfizer offers a variety of career and professional development programs and trainings to promote inclusive growth. The Connected Leaders Academy, a program offered through the

<sup>30</sup> 2021 ESG Report at 39; 2022 ESG Report at 33.

<sup>31</sup> 2021 ESG Report at 39; 2022 ESG Report at 33.



DEI team's partnership with McKinsey & Company, provides a variety of professional development programs for employees at different levels of the company. Employees are nominated to participate, and the course materials educate participants on core business principles, effective leadership styles, and how to drive transformational change within organizations. Pfizer's Elevating Development, Growth, and Experiences ("EDGE") program teaches participants how to promote a culture of innovation and equity within the company. Pfizer leaders nominate employees who have expressed interest in EDGE to the PX and Learning and Development ("L&D") teams, which then select participants for each program. The PX and L&D teams use a data-driven tool to monitor participant enrollment in EDGE programs and confirm that there is equitable participation across all demographic groups. To expand EDGE's reach across the workforce, the PX and L&D teams intentionally select employees who have not previously had the opportunity to participate in a leadership development program. Since its inception in 2022, nearly 400 employees have participated in EDGE globally. Pfizer's practice of monitoring and analyzing equitable participation in the EDGE program is not consistently replicated in all other training programs.

In recent years, Pfizer has focused on leveraging technology to democratize learning and growth opportunities for employees across all demographic groups and skill sets. For example, in 2022, Pfizer launched the Growth Universe, which is a centralized electronic hub for employees to access a wide range of growth resources, expand their skill sets, and connect with employees across departments and office locations.<sup>32</sup> The Growth Universe allows employees to engage with each other by posting their own personal and professional development stories, sharing information about Pfizer's ECRGs, and participating in peer-to-peer coaching and mentoring.<sup>33</sup> Further, Pfizer integrated its job search platform—PfizerJobs—into the Growth Universe to make it easier for employees to search and apply to new roles within the company. Similarly, Pfizer established the Pfizer Learning Academy in 2022 to provide online access to personalized learning materials for all employees. The Pfizer Learning Academy offers articles, videos, podcasts, and toolkits that address a variety of topics, from leadership and cultural awareness to skills for specialized business functions.<sup>34</sup> To inform future learning and training offerings, the L&D team monitors usage of these platforms by measuring clicks. Pfizer does not monitor employee utilization by demographic group. Moving forward, the L&D team is exploring a variety of new technology solutions to further scale Pfizer's learning offerings to reach more employees across the workforce.

## **2. Enterprise Colleague Resource Groups**

Pfizer's ECRGs are an important component of the company's efforts to promote an inclusive work environment. Pfizer currently supports nine ECRGs: Global Asian Alliance, Global Black Community, Disability, Pfizer Latino Community, Out Pfizer Employee Network, Veterans in Pfizer, Pfizer Women's Resource Group, Middle Eastern & North African Resource Alliance, and Global Indigenous Community. Each ECRG acts as a parent organization that sets goals, programming, and strategy that is carried out by more than 100 on-site CRG chapters, which translate ECRG efforts into custom initiatives for local workplace

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<sup>32</sup> 2022 ESG Report at 33.

<sup>33</sup> *Id.*

<sup>34</sup> *Id.* at 34.

communities.<sup>35</sup> Approximately 13,000 employees currently participate in Pfizer’s CRGs, which are open to all employees.

ECRGs offer members and allies various professional development and support opportunities, such as mentorship, networking, and educational programs. For example, the Global Asian Alliance has paired over 500 mentees and mentors since 2017 with the goal of expanding greater employee development opportunities at all levels of the company. The Pfizer Latino Community launched a Latino CRG Learning Hub that provides interview resources and guidance on how to seek out growth opportunities within the company. The Global Black Community offers a variety of professional development programs, including the Key Account Manager (“KAM”) program, which seeks to advance field-based employees to KAM-level roles by providing mentoring and networking opportunities. The program, which began in 2019, resulted in an average promotion rate of approximately 73% across all cohorts. Pfizer does not have an enterprise-wide mentorship or sponsorship program.

ECRGs also host events and implement initiatives to advance Pfizer’s DEI goals. For example, the Global Asian Alliance trained colleagues through the group’s Asian Leadership Forum to host events and discussions on culture, allyship, and intersectionality.<sup>36</sup> The Global Black Community also hosted the “Freedom to Be Me” Juneteenth series, highlighting cultural, ethnic, religious, and gender identities within the Pfizer workforce community.<sup>37</sup> ECRGs frequently host programs during commemorative days or months to promote knowledge-sharing and inclusivity, including events for Martin Luther King Jr. Day, Lunar New Year, Black History Month, Middle Eastern and North African Heritage Month, Asian Pacific American Heritage Month, Juneteenth, World Refugee Day, Hispanic Heritage Month, Diwali, and Native American Heritage Month, among others.

Pfizer provides funding and leadership support to the ECRGs. The DEI team allocates dedicated funding to each ECRG, and each ECRG has an Executive Sponsor. Executive Sponsors are ELT members who help ECRGs articulate a mission, vision, and goals aligned to the company’s broader DEI strategy; increase visibility of ECRG-work among Pfizer’s leadership; connect ECRGs to company resources; and provide career mentoring to ECRG members. In addition, Pfizer established new regional DEI councils in 2021, which are composed of leaders from Pfizer’s regional CRG chapters, to facilitate collaboration across groups.

Pfizer’s DEI team is also in the process of generating a Global Execution Plan, which will serve as a consistent framework for Pfizer’s ECRGs to partner with the PX and DEI teams to build and advance strategy, influence, and leadership within the company. The Global Execution Plan will explain how to request ECRG funding, provide ECRG governance and succession plan models, and develop an ECRG Guidebook, which will help ECRG members understand how to align their goals and initiatives to Pfizer’s enterprise-wide DEI strategy. The DEI team implemented these efforts to help each ECRG see other ECRGs as complementary and interdependent, rather than competing or separate. In addition to resources and guidance produced in-house, Pfizer also provides ECRGs with an Employee Resource Group (“ERG”) Leadership Handbook published by Seramount, a diversity consulting group, which provides specific tools and best practices to help companies develop groups that play vital roles in

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<sup>35</sup> 2021 ESG Report at 38.

<sup>36</sup> 2022 ESG Report at 34.

<sup>37</sup> *Id.*

recruiting, retaining and developing employees, providing insight into diverse communities, and solving complex business problems.

Leaders of Pfizer's ECRGs have an opportunity to take a "Lead with Inclusion Master Class" on a quarterly basis. Each class focuses on a different topic relevant to ECRG leadership. For example, the first Master Class, held in 2021, introduced Pfizer's revamped DEI strategy and zig-zag professional growth model. The session provided an overview of the kinds of resources and support the DEI team provides to Pfizer's ECRGs, including facilitating cross-ECRG connections and providing funding and budget-tracking capabilities.

The Covington assessment team met with some of Pfizer's ECRG leaders to listen to their perspectives on how Pfizer has supported ECRGs and identify any potential areas for improvement. Themes that emerged from the conversation included an appreciation for Pfizer encouraging employees to join multiple groups and reinforcing that ECRGs are open to everyone, including allies, and a view that Pfizer provides adequate funding to support the ECRGs and regularly consults ECRGs on the company's internal and external DEI efforts. Opportunities that were identified in the discussion were based on the sentiment that although Pfizer's senior leadership is supportive of ECRGs and their efforts, not all managers recognize the importance and value of ECRG work for the company, which can discourage employees from dedicating time and attention to ECRG responsibilities, as well as an expressed desire for the company to do more to support ECRG members following corporate reorganizations.

### **3. DEI Programming**

Pfizer hosts regular events and programs designed to foster a community of inclusion within the company. These events seek to help employees recognize, understand, and appreciate their differences and commonalities, and establish a culture of collaboration and understanding throughout the workforce. In 2023, Pfizer launched its DEI Hub on Fuse as a central repository to share information on DEI events, initiatives, and resources with the broader workforce.

Pfizer's DEI team provides an update to the workforce on the company's progress against its DEI goals at the annual DEI Summit. Pfizer defined the theme of the 2023 Summit—"Accelerating Equity,"—as "seeing the difference between the world as it is and as it could be, and making a choice to do something about it with courage and conviction." To accelerate equity and advance progress on Pfizer's DEI goals, the DEI team encouraged workforce members to focus on equity, inclusion, and representation for all; promote belonging; be an ally; increase accessibility; and build appropriate and lawful individualized DEI strategies for their teams that align to Pfizer's broader DEI goals. The DEI Summit also incorporated opportunities for workforce members to watch and participate in panel discussions with civil rights and DEI community leaders. At the 2023 Summit, Pfizer hosted a panel discussion titled "Speedbumps Ahead! Accelerating Equity by Disrupting the Status Quo," which included representatives from the Human Rights Campaign, the U.S. Chamber of Commerce Foundation – Hiring Our Heroes, and Disability:IN. The panelists answered questions regarding current challenges for underrepresented communities, including common misconceptions and stereotypes that are damaging to these communities, and highlighted the importance of allyship and confronting bias in accelerating equity. Over 7,000 employees either attended the 2023 Summit in person or participated remotely. The DEI team sent a survey to participants to solicit feedback. Ninety-eight percent of respondents found the Summit to be a valuable experience and 94% indicated that they will approach differences with their colleagues with more understanding following the Summit.

In 2023, Pfizer released the first course of the DEI Learner’s Journey to Allyship program to all workforce members. The program includes a mix of required and optional courses to educate workforce members on inclusion, collaboration, allyship, psychological safety, and empathy. The first course—The Neuroscience of Smarter Teams (mandatory for all employees)—and the second course—Conscious Inclusion Workshop (mandatory for managers)—seek to help participants improve inclusion, collaboration, and interpersonal interactions between leaders and their teams. Pfizer will release additional Learner’s Journey courses in 2024, including the second course for managers and courses on how to identify and mitigate bias in the workplace. As of December 2023, 91% of the global workforce had completed the first course.

In April 2023, the DEI team hosted its second annual “5-Day Inclusion Challenge” to promote intentional inclusivity among workforce members and eliminate implicit biases in the workplace. On each day of the challenge, the DEI team posted a prompt of “inclusion nudges” on its DEI intranet channel to encourage inclusivity, such as extending a “Bravo Thank You” award to a colleague who demonstrated inclusive behaviors or participating in Pfizer’s self-identification campaign, which is described below.

After the murder of George Floyd, Pfizer began offering Safe Space Sessions to provide an outlet for employees to voice their feelings following major events, including but not limited to the Afghanistan refugee crises, gun violence, the murder of Ahmaud Arbery, the trial of Kyle Rittenhouse, the war in Ukraine, the mass shooting at a Monterey Park Chinese New Year celebration, and the Israel Gaza War.<sup>38</sup>

Pfizer’s DEI team gauges the success of these programs through ad-hoc surveys and partnerships with the People Insights & Analytics team to analyze engagement. For example, following the 5-Day Inclusion Challenge, the DEI team collected participant feedback surveys and tracked employee interactions with the DEI intranet channel. Moving forward, the DEI team plans to continue to measure and assess employee engagement with its programs.

#### **4. Use of Data to Support DEI Goals**

Pfizer collects, analyzes, and publishes workforce demographic data in order to inform and strengthen its Pillar 1 commitments to equity and diversity. Pfizer’s People Insights & Analytics team implemented an internal dashboard that collects and evaluates workforce demographic data to monitor for potential disparities in professional mobility, set equitable aspirational representation goals, track progress toward achieving those goals, and report to company leaders, including bimonthly reports to the ELT. This workforce demographic data helps Pfizer hold itself accountable to its aspirational opportunity parity goals. In 2019, Pfizer’s leadership reviewed company workforce data and found that employees in leadership roles were less diverse than employees at lower levels of the company. To reflect the diversity of Pfizer’s workforce at leadership levels, the company set an aspirational opportunity parity goal to achieve workforce parity of 32% for U.S. minorities<sup>39</sup> in VP and above positions by 2025, which would align leadership representation levels with the representation levels reflected in the broader workforce.<sup>40</sup> By December 2023, Pfizer reported that 30.5% of its VP and above

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<sup>38</sup> 2021 ESG Report at 23.

<sup>39</sup> Pfizer defines U.S. minorities to include all U.S.-based persons of color and individuals that identify as two or more races.

<sup>40</sup> 2022 ESG Report at 35.

employees are U.S. minorities,<sup>41</sup> an increase from 25% at the end of 2021.<sup>42</sup> Additionally, three out of twelve members of the Board of Directors identify as Black, Latino, or Asian.<sup>43</sup>

In further support of these efforts, Pfizer launched a voluntary self-identification campaign in 2022 to better understand the demographic composition of its U.S. workforce.<sup>44</sup> Approximately 5,000 workforce members self-identified within the first hour of the launch.<sup>45</sup> In response to employee feedback, Pfizer recently added a new category of race and ethnicity in the self-ID form—Middle Eastern or North African—to ensure employees feel more accurately represented. Pfizer plans to use the aggregated self-ID data collected during this campaign to further inform its inclusive recruitment, employee development opportunities, benefits offerings, and other equity and inclusion efforts.<sup>46</sup>

Pfizer also publishes workforce demographic data in annual reports and will continue to report its progress on its opportunity parity goals moving forward.<sup>47</sup> Pfizer included new hire and attrition data, including by gender, race, and ethnicity, in its recent Impact Report. To increase transparency regarding its workforce composition, Pfizer has voluntarily published its EEO-1 reports for 2016 through 2021, and is committed to continuing to disclose future reports as they are filed with the Equal Employment Opportunity Commission.<sup>48</sup>

In addition to these efforts, Pfizer measures employee sentiment to support the company's goal of establishing an inclusive and welcoming culture for all employees. Pfizer conducts an annual global employee engagement survey, referred to as Pfizer Pulse, and tracks and analyzes the results to identify priority areas for growth and improvement.<sup>49</sup> The survey asks employees to rank their level of agreement with a variety of statements covering topics such as awareness and comfort levels with reporting misconduct or concerns, job satisfaction and opportunities for growth, feeling motivated and valued, and personal engagement with Pfizer's values.

Pfizer's People Insights & Analytics team tracks completion of the survey and interprets the aggregated results to identify and report on trends to Pfizer's leadership. The People Insights & Analytics team tracks completion and results by demographic information, including as it relates to intersectionality. Pulse survey data is currently not used as a basis to hold leaders accountable to progress toward Pfizer's DEI goals.

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<sup>41</sup> Pfizer, *Pfizer Statement on Results of Fifth Annual Pay Equity Study Among Colleagues Worldwide*, (Feb. 23, 2024), <https://www.pfizer.com/news/announcements/pfizers-statement-results-fifth-annual-pay-equity-study-among-colleagues> [hereinafter "Fifth Annual Pay Equity Study"].

<sup>42</sup> 2022 ESG Report at 35.

<sup>43</sup> *Id.* at 7; 2023 Proxy Statement at 7.

<sup>44</sup> 2022 ESG Report at 34.

<sup>45</sup> *Id.*

<sup>46</sup> *Id.*

<sup>47</sup> *Id.* at 7, 35.

<sup>48</sup> Pfizer, *Equal Employment Opportunity: Employer Information Report (2016–2021)*, <https://cdn.pfizer.com/pfizercom/Pfizer-2016-2021-EEO1-Reports-13JAN2023.pdf>.

<sup>49</sup> 2022 ESG Report at 33.



Pfizer includes targeted questions in the survey intended to measure employees' feelings of inclusion and belonging, or the "inclusion index." The survey asks employees to rate their agreement with two statements: "my team has a climate in which diverse perspectives are valued," and "I feel valued as an employee of Pfizer." In 2023, 85% of U.S. survey participants agreed that their team has a climate in which diverse perspectives are valued, and 77% agreed that they feel valued as an employee of Pfizer, with near parity among all demographic groups. Although not formally included in the inclusion index, over 75% of survey participants also agreed that the company provides an "equal opportunity for all to succeed at Pfizer."

To gather additional feedback on the employee experience, Pfizer began collecting anonymous exit surveys in 2022, which are administered by the Office of the Ombuds. The People Insights & Analytics team uses the exit survey results to identify trends and to improve the company's PX strategy.

## Recommendations

- Consider enhancing coordination of efforts to track employee participation in professional development and learning programs and analyzing that data by demographic categories to understand whether employees can equitably access and participate in these programs. To encourage equitable participation, Pfizer could conduct outreach campaigns regarding professional development and learning programs and work with managers to reduce barriers to entry for employee participation.
- Consider assigning a team or individual with responsibility for overseeing enterprise-level coordination between the various mentorship programs across the company to strengthen consistency and coordination. Pfizer could also consider opportunities to develop a consistent or enterprise-wide sponsorship program that connects high-performing employees with company leaders who will promote their career growth and provide them with opportunities for increased visibility.
- Consider opportunities to use Pulse survey results related to equity and inclusion indicators to enhance leadership accountability for Pfizer's equity and inclusion goals.

### D. Equitable Pay and Inclusive Benefits

#### 1. Equitable Compensation Practices

For the past five years, Pfizer has worked with a third-party assessment team to conduct annual compensation studies that measure pay equity throughout the company based on race and gender.<sup>50</sup> Compensation studies cover the entire workforce except the CEO and other limited exceptions.<sup>51</sup> If outliers are identified during the study, Pfizer will work with the third-

<sup>50</sup> Fifth Annual Pay Equity Study; 2022 ESG Report at 35.

<sup>51</sup> Exceptions include employees whose pay is determined by a collective bargaining agreement and divested employees who experience a delayed transfer following a transaction.

party assessment team to determine an appropriate remediation option to implement for affected employees.

The February 2024 compensation study found that in the United States, racial and ethnic minority employees are paid at dollar-for-dollar parity with non-minority employees.<sup>52</sup> To hold itself accountable to its pay equity commitments, Pfizer intends to measure and publish data on pay equity annually moving forward.<sup>53</sup>

Pfizer also publishes information on median pay gaps for minority employees in the United States.<sup>54</sup> The median pay gap measures the distribution of pay among employees without accounting for any factors, like role or title.<sup>55</sup> In 2023, the median pay for minority employees in the United States was 82.8% of the median pay for non-minority employees.<sup>56</sup> The majority of Pfizer's racially or ethnically diverse employees are located at manufacturing sites, where salaries tend to be lower. Pfizer is working to narrow this gap by increasing racial and ethnic minority representation at all levels of the company through its inclusive hiring practices and professional development programs.

Pfizer also takes steps to eliminate pay disparities for open positions and new hires. Pfizer's Total Rewards team benchmarks its compensation against peer companies using external market data to provide an unbiased representation of the labor market in the pharmaceutical industry. Pfizer also recently stopped asking U.S. applicants to disclose their salary history during the recruiting process. In addition, Pfizer publishes salary ranges in job advertisements in states that require it and in all job offers for new hires. Pfizer's pay equity practices earned the company an "A" grade on the Arjuna Capital/Proxy Impact Racial and Gender Pay Equity Scorecard for 2021, 2022, and 2023.<sup>57</sup>

## 2. Inclusive Benefits Offerings

Pfizer offers a competitive benefits package for all employees who work at least 40% of a full-time schedule. Pfizer offers three medical plans through two different administrators so that employees can select the comprehensive medical coverage that suits them best.<sup>58</sup> Pfizer's wellbeing benefits include access to free mental health resources and tools, including an app that helps employees manage stress, improve focus, and strengthen connections with others.<sup>59</sup> In addition, Pfizer offers a 401(k) savings plan under which the company makes annual

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<sup>52</sup> Fifth Annual Pay Equity Study.

<sup>53</sup> 2022 ESG Report at 35.

<sup>54</sup> Fifth Annual Pay Equity Study.

<sup>55</sup> 2022 ESG Report at 35.

<sup>56</sup> Fifth Annual Pay Equity Study.

<sup>57</sup> 2021 ESG Report at 38; 2022 ESG Report at 35; Arjuna Capital & Proxy Impact, *Racial and Gender Pay Scorecard* (2023) at 4, <https://static1.squarespace.com/static/5bc65db67d0c9102cca54b74/t/640f22770d7c0634287c57c3/1678713464204/Racial+and+Gender+Pay+Scorecard+2023.pdf#page=4>.

<sup>58</sup> Pfizer Benefits, *Your Medical Benefits*, <https://mypfizerbenefits.com/health/medical-3/> (last visited Mar. 11, 2024).

<sup>59</sup> Pfizer Benefits, *Healthy Pfizer*, <https://mypfizerbenefits.com/health/healthy-pfizer/> (last visited Mar. 11, 2024); Pfizer Benefits, *Thrive Global*, <https://mypfizerbenefits.com/health/healthy-pfizer/thrive-global/> (last visited Mar. 11, 2024).

retirement savings contributions (between 5% and 9% based on age and service) and quarterly matching contributions of 4.5% for employees who contribute at least 6% of eligible pay.<sup>60</sup> Pfizer also offers educational assistance to its employees through its Tuition Reimbursement Program, which reimburses eligible employees up to \$10,000 annually for tuition and other expenses for courses at approved educational institutions.<sup>61</sup>

Pfizer's benefits program is designed to support the needs of its full employee population. For example, Pfizer provides access to educational health resources to all of its workforce members through its participation in the Take Action For Our Health initiative. Take Action For Our Health seeks to reduce health disparities in Latino and Black communities by providing educational resources to help these communities understand their increased risk for certain health conditions and how they can address these risks, including through preventative screenings.<sup>62</sup> Pfizer's Benefits team also organizes outreach initiatives to specific workforce populations based on commemorative days or months related to DEI. During Black History Month, the Benefits team partnered with its 401(k) plan administrator, Fidelity Investments, to bring together leading Fidelity representatives and financial education leaders for a panel discussion regarding how to establish a financial legacy that employees can pass on to their future generations. In addition, the Benefits team is invited to attend Pfizer's Safe Space Sessions, described above, to highlight various benefits offerings that may help workforce members during mentally and emotionally challenging times. Moving forward, Pfizer is planning to offer more comprehensive mental health resources with the goal of increasing utilization among underrepresented workforce members, including by highlighting how to access providers of specific races, gender, language capabilities, and experience servicing diverse populations.

Pfizer uses employee surveys to regularly assess its benefits offerings. In 2020, Pfizer conducted a social determinants of health survey to understand how its employees' living and working conditions impact their health, functioning, and quality-of-life. Pfizer also issued two benefits feedback surveys, in 2021 and 2022, to seek input from employees on how the company could improve the overall benefits experience. As a result of the 2021 feedback, the Benefits team developed a comprehensive and easy-to-navigate website to increase accessibility and expand awareness of benefits offerings. Beyond surveys, the Benefits team also engages with the DEI team to ensure that the Benefits team is aware of concerns or suggestions raised by underrepresented segments of Pfizer's workforce regarding the company's benefits programs.

The 2021 and 2022 benefits survey captured information on participants' age and office location, but did not solicit race or ethnicity demographic data. Pfizer is able to review aggregate-level demographic data vendor-by-vendor based on the offering or program. For example, Fidelity, Pfizer's 401(k) plan administrator, can provide aggregate-level race and ethnicity demographic information, which Pfizer uses to inform its employee awareness and education strategy to promote equitable utilization. Pfizer has not conducted a formal data-driven DEI assessment of all of its benefits offerings.

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<sup>60</sup> Pfizer Benefits, *The Pfizer 401(k) Savings Plan*, <https://mypfizerbenefits.com/financial-security/savings-plan/> (last visited Mar. 11, 2024).

<sup>61</sup> Pfizer Benefits, *Educational Assistance for Colleagues*, <https://mypfizerbenefits.com/life-family/educational-assistance-for-colleagues/> (last visited Mar. 11, 2024).

<sup>62</sup> Take Action For Health, <https://www.takeactionforhealth.org/> (last visited Mar. 11, 2024).

## Recommendations

- Consider undertaking a comprehensive assessment of equity and inclusion considerations in benefits offerings to help Pfizer assess whether its programs maximize care for the full employee population. Pfizer could further enhance these efforts by seeking more frequent feedback from the workforce, including from the ECRGs and DEI team, on its benefits offerings.

## VII. Pillar 2: Advance Equitable Health Outcomes

Pillar 2 of the company's DEI strategy focuses on promoting equitable health outcomes, and includes three key health equity objectives: conducting inclusive research; improving health outcomes; and removing barriers that impede access to medicines. This section of the report describes Pfizer's approach to each of these objectives, highlighting the key initiatives the company has undertaken in the United States in support of each. As described in this section, Pfizer is making progress towards the goals included in Pillar 2. This section also includes recommendations on how Pfizer might build upon these efforts to increase their impact.

### A. Understanding Opportunities to Advance Health Equity

In 2003, a report<sup>63</sup> from the Institute of Medicine ("IOM") on health equity in the United States found that "racial and ethnic minorities, with few exceptions, experience higher rates of morbidity and mortality than non-minorities"<sup>64</sup> In particular, the report found that "racial and ethnic minorities tend to receive a lower quality of healthcare than non-minorities, even when access-related factors, such as patients' insurance status and income, are controlled."<sup>65</sup> The IOM report concluded that the "sources of these disparities are complex, are rooted in historic and contemporary inequities, and involve many participants at several levels..."<sup>66</sup>

Research conducted in the twenty years since the publication of the IOM report suggests that many of these disparities have persisted.<sup>67</sup> In 2022, the United States Department of Health and Human Services published its *National Healthcare Disparities Report* ("NHDR Report"), which described ongoing racial disparities in health outcomes.<sup>68</sup> For example, according to the NHDR Report, while life expectancy in the United States has fallen by 1.5

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<sup>63</sup> *Unequal Treatment, Confronting Racial and Ethnic Disparities in Health Care*, Institute of Medicine at 29 (Brian D. Smedley, Adrienne Y. Stith, Alan R. Nelson eds., 2003), <https://nap.nationalacademies.org/read/12875/chapter/3>.

<sup>64</sup> *Id.*

<sup>65</sup> *Id.* at 1.

<sup>66</sup> *Id.*

<sup>67</sup> Aarathi Prasad & David Williams: *Finding Solutions for Racial Inequities in Health*, *The Lancet* (Vol. 400, Nov. 19, 2022); Marsha Gold, *Reducing Health Care Disparities: Where Are We Now?*, Mathematica Policy Research, Robert Wood Johnson Foundation (Mar. 2014).

<sup>68</sup> Agency for Healthcare Research and Quality, *National Healthcare Quality and Disparities Report* (2022), <https://www.ahrq.gov/sites/default/files/wysiwyg/research/findings/nhqdr/2022qdr.pdf>.

years for the overall population from 78.8 years in 2019 to 77.3 years in 2020, the decline has been greater for Hispanic (3.0 years) and non-Hispanic Black (2.9 years) individuals than for non-Hispanic white individuals.<sup>69</sup> Racial health disparities also result in significant economic harms in the United States.<sup>70</sup> A study funded by the National Institutes of Health (“NIH”) found that in 2018, the total burden of racial and ethnic health disparities totaled \$451 billion, the equivalent of \$1,377 per person and a sum equal to approximately 2% of the U.S. gross domestic product.<sup>71</sup>

Racial and ethnic disparities in health outcomes in the United States result from a variety of complex factors.<sup>72</sup> Healthcare providers, public and private health plans, hospitals, community organizations, pharmaceutical companies, and others in the healthcare delivery system have opportunities to address some of the fundamental drivers of health disparities,<sup>73</sup> although the form these opportunities may take varies widely among these different actors. Pharmaceutical companies are well positioned to help address some of the drivers of health disparities by increasing clinical trial diversity and working to reduce potential barriers patients face in supporting their health and obtaining healthcare.

## 1. Representation in Research and Clinical Trials

Historically, individuals from certain demographics have been underrepresented in some biomedical research,<sup>74</sup> including research regarding medical conditions that disproportionately affect members of these groups.<sup>75</sup> Industry and government agencies, including the Food and Drug Administration (“FDA”), increasingly recognize the need for greater diversity among participants in clinical trials, but challenges to enrolling patients from

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<sup>69</sup> *Id.* at 19.

<sup>70</sup> Thomas A. LaVeist et al., *Estimating the Economic Burden of Racial Health Inequalities in the United States*, 41 Int’l J. of Health Servs. 231 (Apr. 1, 2011); *The Economic Burden of Racial, Ethnic, and Educational Health Disparities in the U.S., 2018*, National Institute on Minority Health and Health Disparities, <https://www.nimhd.nih.gov/about/publications/economic-burden-health-disparities-US-2018.html#:~:text=The%20total%20burden%20of%20racial,of%20the%20economy%20in%202018> (last visited Mar. 11, 2024).

<sup>71</sup> *The Economic Burden of Racial, Ethnic, and Educational Health Disparities in the U.S.*, *supra* note 70.

<sup>72</sup> *Unequal Treatment, Confronting Racial and Ethnic Disparities in Health Care*, *supra* note 63, at 7–8.

<sup>73</sup> *See, e.g.*, PhRMA, *PhRMA’s Equity Initiative*, <https://phrma.org/en/Equity> (last visited Mar. 11, 2024); Nambi Ndugga & Samantha Artiga, *Disparities in Health and Health Care: 5 Key Questions and Answers*, KFF (Apr. 21, 2023), <https://www.kff.org/racial-equity-and-health-policy/issue-brief/disparities-in-health-and-health-care-5-key-question-and-answers/>; Anas El Turabi et al., *Health Equity: A Framework for the Epidemiology of Care* (Mar. 12, 2022), <https://www.mckinsey.com/industries/life-sciences/our-insights/health-equity-a-framework-for-the-epidemiology-of-care>.

<sup>74</sup> “Underrepresented racial and ethnic populations in the United States [include individuals who are] Black or African American, Hispanic/Latino, Indigenous and Native American, Asian, Native Hawaiian and Other Pacific Islanders, and other persons of color. Individuals from these populations are frequently underrepresented in biomedical research despite having a disproportionate disease burden for certain diseases relative to their proportional representation in the general population.” Draft FDA Guidance: Diversity Plans to Improve Enrollment of Participants from Underrepresented Racial and Ethnic Populations in Clinical Trials Guidance for Industry at 1 (Apr. 2022), <https://www.fda.gov/media/157635/download>.

<sup>75</sup> *Id.*



underrepresented racial and ethnic populations remain.<sup>76</sup> Increasing diversity in clinical trials requires careful planning in the trial design, including with respect to expanding access to potential participants, enrollment criteria and methodology, and efforts to promote retention in the trial.<sup>77</sup> A 2022 report from McKinsey suggested that pharmaceutical companies could play an important role analyzing data to “identify unmet needs and to compare the populations that have benefited more from [companies’] R&D spending and pipeline development with those that have benefitted less.”<sup>78</sup> As described below, Pfizer has taken a number of steps to increase diversity among research participants and to identify unmet needs in research.

## 2. Social Determinants of Health, Including Healthcare Access

Several social, economic, and environmental factors—often referred to as social determinants of health (“SDOH”)—contribute to health disparities in the United States, including in the amount and quality of treatment. The Centers for Disease Control and Prevention (“CDC”) defined SDOH as the “nonmedical factors that influence health outcomes,” including the “conditions in which people are born, grow, work, live, and age, and the wider set of forces and systems shaping the conditions of daily life.”<sup>79</sup> Individual determinants fall within the following categories: (i) healthcare access and quality, (ii) education access and quality, (iii) economic stability, (iv) neighborhood and built environment, and (v) social and community context.<sup>80</sup> Some studies suggest that SDOH have a greater influence on health than either access to healthcare<sup>81</sup> or genetic factors.<sup>82</sup>

Lack of access to healthcare and medication contribute to poor health outcomes,<sup>83</sup> and research shows that members of certain racial and ethnic groups are less likely to receive routine and preventive care,<sup>84</sup> even after adjusting for insurance coverage and socioeconomic

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<sup>76</sup> *Id.*

<sup>77</sup> *Id.* at 6–7.

<sup>78</sup> El Turabi et al., *supra* note 73 (“That approach opens up the possibility of discovering significant white spaces. Is there a condition that does not have an effective intervention or has a set of patients who aren’t being included? Is there a condition that is being underfunded when the impact of investing in a medicine or therapy could be just as high, if not even higher, than the returns achieved from a similar medicine or therapy that the company is already developing or providing?”).

<sup>79</sup> Centers for Disease Control and Prevention, *Social Determinants of Health at CDC*, <https://www.cdc.gov/about/sdoh/index.html> (last visited Mar. 11, 2024).

<sup>80</sup> *Id.*

<sup>81</sup> National Healthcare Quality and Disparities Report, *supra* note 68, at 23.

<sup>82</sup> Centers for Disease Control and Prevention, *Why is Addressing Social Determinants of Health Important for CDC and Public Health?*, <https://www.cdc.gov/about/sdoh/addressing-sdoh.html> (last visited Mar. 11, 2024).

<sup>83</sup> PhRMA, *Addressing Disparities in Medication Access and Adherence* (May 31, 2022), <https://phrma.org/en/Equity/Addressing-Disparities-in-Medication-Access-and-Adherence>.

<sup>84</sup> Karen A. Lees et al., *Comparison of Racial/Ethnic Disparities in Adult Immunization and Cancer Screening*, *Am. J. Prev. Med.* 2005;29:404-11; Mary Patricia Nowalk et al., *Using Quantitative and Qualitative Approaches to Understand Racial Disparities in Adult Vaccination*, *J. Natl. Med. Assoc.*, 2009;101:1052-60; Annette E. Maxwell et al., *Disparities in the Receipt of Fecal Occult Blood Test Versus Endoscopy Among Filipino American Immigrants*, *Cancer Epidemiol Biomarkers Prev.* 2008;17:1963-7; Scott H. Stewart MD & Marc D. Silverstein MD, *Racial and Ethnic Disparity in Blood Pressure and Cholesterol Measurement*, *J. Gen. Intern. Med.* 2002;17:405-11.

status.<sup>85</sup> When they do receive care, it is often of relatively lower quality.<sup>86</sup> In the United States, most individuals have health insurance coverage through private, employer-sponsored health plans.<sup>87</sup> Others have insurance coverage through public programs offered by federal or state governments, and a minority of individuals have no health insurance coverage.<sup>88</sup> Compared to non-Hispanic whites, African Americans and people of Hispanic origin had persistently lower health insurance coverage rates at all ages even since the passage of the Affordable Care Act in 2010.<sup>89</sup>

Those without adequate health insurance face considerable barriers to accessing healthcare because many healthcare providers either do not accept patients without insurance or charge prohibitively high rates to care for uninsured patients.<sup>90</sup> Even when patients are insured, financial costs can be a significant barrier to obtaining effective treatment. For example, studies show that high out-of-pocket costs for prescription medication are linked to high rates of treatment abandonment.<sup>91</sup> Likewise, patients who earn relatively lower incomes seek healthcare less often than patients who earn higher incomes.<sup>92</sup> And when patients who earn lower incomes do seek healthcare, it is more likely to be for an emergency.<sup>93</sup> Racial and ethnic disparities with respect to income and wealth in the United States amplify these effects in certain communities in the United States.<sup>94</sup>

While no single actor in the U.S. healthcare system could address each of these factors comprehensively, Pfizer and other biopharmaceutical companies have opportunities to address some of the factors contributing to racial and ethnic health disparities in the United States.<sup>95</sup> In particular, pharmaceutical companies have opportunities to collaborate with other healthcare

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<sup>85</sup> Matthew Wynia, MD, MPH, et al., *Collecting and Using Race, Ethnicity and Language Data in Ambulatory Settings: A White Paper with Recommendations from the Commission to End Health Care Disparities* at 6, [https://www.ama-assn.org/system/files/corp/media-browser/public/health-policy/cehcd-redata\\_o.pdf](https://www.ama-assn.org/system/files/corp/media-browser/public/health-policy/cehcd-redata_o.pdf); Unequal Treatment, Confronting Racial and Ethnic Disparities in Health Care, *supra* note 63, at 38.

<sup>86</sup> Wynia et al., *supra* note 85, at 6; Unequal Treatment, Confronting Racial and Ethnic Disparities in Health Care, *supra* note 63, at 38.

<sup>87</sup> Katherine Keisler-Starkey & Lisa N. Bunch, *Health Insurance Coverage in the United States: 2020*, United States Census Bureau (Sept. 14, 2021), <https://www.census.gov/library/publications/2021/demo/p60-274.html>.

<sup>88</sup> *Id.*

<sup>89</sup> Heeju Sohn, *Racial and Ethnic Disparities in Health Insurance Coverage: Dynamics of Gaining and Losing Coverage over the Life-Course*, 36 *Population Rsch. and Pol'y Rev.* 181–201 (2017).

<sup>90</sup> Jennifer Tolbert et al., *Key Facts About the Uninsured Population*, KFF (Dec. 18, 2023), <https://www.kff.org/uninsured/issue-brief/key-facts-about-the-uninsured-population/>.

<sup>91</sup> Jalpa A. Doshi et al., *Association of Patient Out-of-Pocket Costs with Prescription Abandonment and Delay in Fills of Novel Oral Anticancer Agents*, 36 *J. Clinical Oncology* 476, 478 (Feb. 10, 2018).

<sup>92</sup> Gay Becker PhD & Edwina Newsom, *Socioeconomic Status and Dissatisfaction with Health Care Among Chronically Ill African Americans*, 93 *Am. J. Public Health* 742, 742, 745 (May 2003).

<sup>93</sup> *Id.*

<sup>94</sup> *Id.*

<sup>95</sup> Adi Natu et al., *Leaning on Ecosystem Partnerships to Achieve Health Equity*, ZS (May 8, 2022), <https://www.zs.com/insights/pharma-and-payer-partnerships-improve-sdoh-outcomes>.

and community stakeholders to help address SDOH,<sup>96</sup> and, because of their nationwide reach, to help address certain SDOH directly. For example, pharmaceutical companies can help address some of the disparities presented by lack of insurance coverage through programs designed to help provide treatment for uninsured patients.<sup>97</sup> Pharmaceutical companies can also help address health disparities by engaging with patients in a way that acknowledges and attempts to mitigate underlying SDOH.<sup>98</sup> In addition to Pfizer's efforts to increase diversity in clinical trials and pharmaceutical research, the company's efforts to promote health equity by helping to mitigate the effects of SDOH are described in the following sections.

## **B. Inclusive Research**

### **1. Increasing Clinical Trial Diversity**

Pfizer's first objective under Pillar 2 focuses on inclusive research. Pfizer's efforts to diversify the population of patients who participate in its clinical trials are an important component of this objective. Clinical trials are research studies that test a medical, surgical, or behavioral intervention in people to determine whether it is safe and effective.<sup>99</sup> The FDA has noted that diversity of participants in clinical trials is crucial to advancing health equity because people of different races and ethnicities may react differently to treatments.<sup>100</sup> Clinical trial diversity also helps to expand scientific knowledge, ensure that approved medicines are effective for a wide variety of individuals, promote fairer distribution of gains in medical advancements, and increase trust in medical institutions and medical research.<sup>101</sup> As noted above, however, racial minorities still account for a low percentage of participants in U.S. clinical trials.<sup>102</sup> The issue of inclusive clinical trial design has gained increasing national attention in recent years, including with recent federal legislation in the United States focused on designing

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<sup>96</sup> Addressing Disparities in Medication Access and Adherence, *supra* note 83, at 8.

<sup>97</sup> See, e.g., Centers for Medicare & Medicaid Services, *Pharmaceutical Manufacturer Patient Assistance Program Information*, <https://www.cms.gov/medicare/coverage/prescription-drug-coverage/patient-assistance-program> (last visited Mar. 11, 2024).

<sup>98</sup> El Turabi et al., *supra* note 73.

<sup>99</sup> National Institutes of Health, *What Are Clinical Trials and Studies?*, <https://www.nia.nih.gov/health/what-are-clinical-trials-and-studies> (last visited Mar. 11, 2024).

<sup>100</sup> U.S. Food & Drug Administration, *Clinical Trial Diversity*, <https://www.fda.gov/consumers/minority-health-and-health-equity/clinical-trial-diversity> (last visited Mar. 11, 2024).

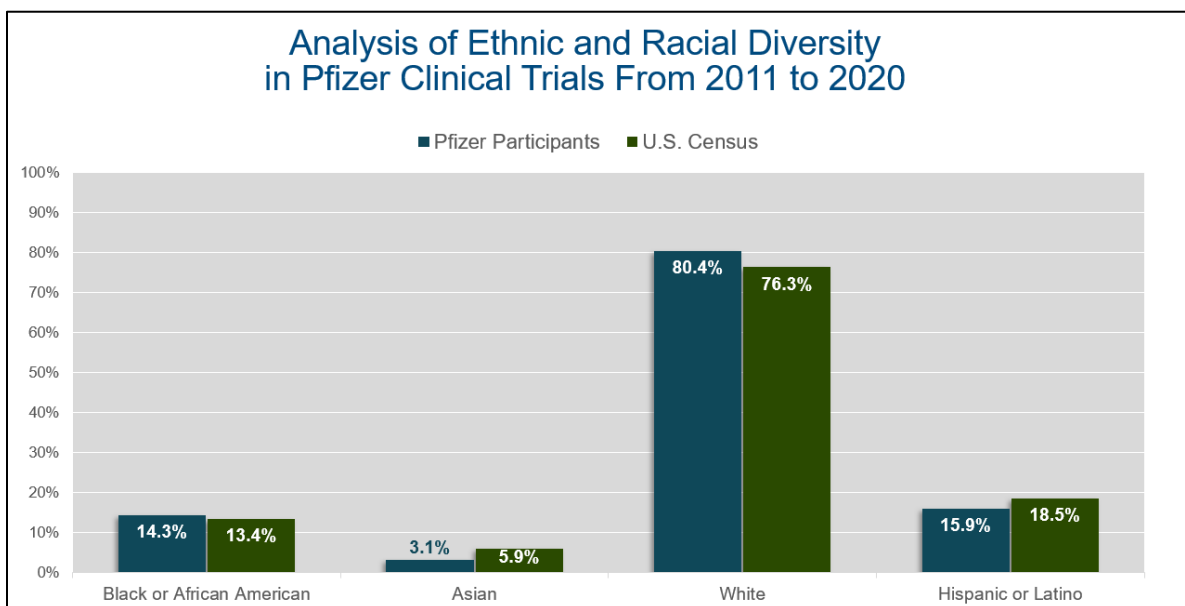
<sup>101</sup> Aaron L. Schwartz, MD, Ph.D., et al., *Why Diverse Clinical Trial Participation Matters*, *The New England Journal of Medicine* (Apr. 6, 2023), <https://www.nejm.org/doi/full/10.1056/NEJMp2215609>.

<sup>102</sup> U.S. Food & Drug Administration, *Drug Trials Snapshots Summary Report 2022*, <https://www.fda.gov/media/168662/download?attachment> (last visited Mar. 11, 2024) (summarizing demographic data from trials supporting the approval of new drugs in 2022); Clinical Trial Diversity, *supra* note 100 (“[P]eople from racial and ethnic minority and other diverse groups are underrepresented in clinical research. This is a concern because people of different ages, races, and ethnicities may react differently to certain medical products.”).

and conducting more inclusive trials.<sup>103</sup> Civil rights and advocacy organizations that attended the May 2023 roundtable, as well as the organizations interviewed by the assessment team, emphasized the importance of addressing this issue and increasing clinical trial diversity.

### a) Clinical Trial Program Assessment and Clinical Trial Diversity Goals

In 2021, Pfizer conducted an analysis of the ethnic, racial, age, and gender diversity across all of its U.S. clinical trial participants from 2011 to 2020 to assess the state of its own efforts to enroll diverse clinical trial participants.<sup>104</sup> Pfizer published the study, and the results as they relate to ethnic and racial diversity are reflected below.<sup>105</sup>



Pfizer also assessed how many of its trials achieved census level diversity. With respect to individual trials, Pfizer found that more than half of the participants in its 2011 to 2020 trials achieved census levels for various groups: 56.1% of trials achieved census levels for Black or African American participants, 52.3% for Hispanic and Latino participants, and 51.4% for white participants.<sup>106</sup> However, representation was not uniform across the 213 trials studied.<sup>107</sup>

<sup>103</sup> In December 2022, President Biden signed into law the Food and Drug Omnibus Reform Act of 2022 (“FDORA”), which includes several provisions intended to promote diversity in clinical trial enrollment. Food and Drug Omnibus Reform Act of 2022, Pub. L. No. 117-328, Div. FF, Title III, § 3001, 136 Stat. 5807 (2022). Specifically, under FDORA, sponsors of drugs subject to a late-stage clinical trial must submit a Diversity Action Plan that includes: (i) the sponsor’s goals for enrollment in the study; (ii) the sponsor’s rationale for those goals; and (iii) an explanation of how the sponsor intends to meet those goals. *Id.* § 3601, 136 Stat. at 5860.

<sup>104</sup> Melinda Rottas et al., *Demographic Diversity of Participants in Pfizer Sponsored Clinical Trials in the United States*, 106 *Contemp. Clinical Trials* 106421 (July 2021).

<sup>105</sup> *Id.* at 7.

<sup>106</sup> *Id.* at 8.

<sup>107</sup> *Id.* at 17.

Although over 50% of trials had representation at or above census levels for Black or African American and Hispanic or Latino participants, Pfizer reported that “[t]he percentage of trials that achieved census levels was much lower for Asian (16.0%), Native Hawaiian or Other Pacific Islander (14.2%), and American Indian or Alaska Native participants (8.5%).”<sup>108</sup> Pfizer’s published analysis noted that “[t]hese differential findings highlight the need for creating solutions that ensure diverse representation within a trial across all populations.”<sup>109</sup>

After publishing its analysis, Pfizer publicly committed to achieving racially and ethnically diverse participation at or above U.S. census or disease prevalence levels, as appropriate, in all of its clinical trials.<sup>110</sup> Pfizer is monitoring its progress toward this goal.

In addition to tracking the company’s progress toward specific diversity goals across all U.S. clinical trials, Pfizer evolved its approach to set recruitment and site selection goals for each therapeutic area. These goals create greater accountability by tracking the percentage of clinical trials within each therapeutic area that are meeting their study-level goals. In setting goals for each therapeutic area, Pfizer draws on criteria such as the prevalence of a particular disease across demographic groups and census data for various groups’ representation in the population.

Pfizer’s clinical trial teams include diversity objectives in clinical development plans for each new therapy. The teams then develop recruiting strategies to meet the objective and to ensure that the enrollment criteria do not unduly prevent individuals from particular racial or ethnic groups from participating. For example, if a certain disease that is prevalent among a particular racial group is listed as an exclusion criteria (e.g., individuals with that disease are not eligible to participate in the clinical trial), the clinical trial team will determine whether that exclusion criteria is necessary or whether it can be safely altered or eliminated. Pfizer monitors data from its clinical trials to see how each study’s participant recruitment is tracking against Pfizer’s goals.

In addition to focusing on its own clinical trials, Pfizer has published peer-reviewed research regarding the use of inclusive clinical trial design to diversify participant representation.<sup>111</sup> The research focused on evaluating frameworks for setting diverse enrollment goals in clinical trials of both therapeutic treatments and preventive vaccine programs, and analyzed limitations presented by different data sources.<sup>112</sup> Pfizer’s research has informed its own approach to clinical trial enrollment. As part of this research, Pfizer convened an advisory board of epidemiologists with expertise in health disparities, equity, diversity, and SDOH to evaluate and develop a framework to address underrepresentation of historically medically underserved groups.<sup>113</sup> Pfizer published this research so that other companies and institutions could benefit from this effort.

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<sup>108</sup> *Id.*

<sup>109</sup> *Id.*

<sup>110</sup> *Id.* at 18.

<sup>111</sup> Mark R. Cullen et al., *A Framework for Setting Enrollment Goals to Ensure Participant Diversity in Sponsored Clinical Trials in the United States*, 129 *Contemp. Clinical Trials* 107184 (June 2023).

<sup>112</sup> *Id.* at 2–3.

<sup>113</sup> *Id.*



## b) Steps to Increase Diversity Among Clinical Trial Participants

To increase diversity among its clinical trial participants, Pfizer has taken steps towards eliminating barriers to clinical trial participation,<sup>114</sup> which researchers suggest include: (i) lack of trust in the medical establishment and/or the clinical trial process;<sup>115</sup> (ii) lack of awareness about the availability of clinical trials;<sup>116</sup> and (iii) time and resource constraints associated with clinical trial participation.<sup>117</sup> Several of Pfizer's efforts to help address these barriers are summarized below.

- To address an ongoing lack of trust in the medical community among some members of underrepresented communities, Pfizer often collaborates with community organizations that work on health equity issues.<sup>118</sup> For example, Pfizer partnered with the Tigerlily Foundation to conduct a series of Health Equity Advocacy and Leadership ("HEAL") Workshops aimed at helping build trust with Black women through discussions of topics like bias, transparency in communications, and humanizing the clinical trial experience.<sup>119</sup> Pfizer also provided funding for a program that trained clinical trial community navigators to staff clinical trials. Research has suggested that community health workers' involvement in clinical trials may facilitate increased representation of racial minority groups as they are uniquely positioned to build trust and foster connection between researchers and underrepresented community members.<sup>120</sup>
- To promote awareness of clinical trials among underrepresented populations, Pfizer works with clinical trial sites to identify the languages spoken by individuals in the local community. Pfizer then works with the sites to publicize the clinical trial in that language, and through channels that will reach members of underrepresented communities (for

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<sup>114</sup> Pfizer, *Diversity and Inclusion in Clinical Trials Breakthroughs for All*, <https://www.pfizerclinicaltrials.com/about/diversity-inclusion-clinical-trials> (last visited Mar. 11, 2024); see also Schwartz et al., *supra* note 101 (suggesting that reducing barriers could help close gaps in clinical trial representation).

<sup>115</sup> Schwartz et al., *supra* note 101. Underrepresented minority groups' lack of trust in the medical establishment and clinical research can be understood in the context of historical injustices in the name of clinical care, such as the U.S. Public Health Service Syphilis Study at Tuskegee and the forced sterilization of Native American women in the 1960s and 1970s by the U.S. Indian Health Service. *Id.*; National Library of Medicine: Native Voices, 1976: *Government Admits Unauthorized Sterilization of Indian Women*, <https://www.nlm.nih.gov/nativevoices/timeline/543.html> (last visited Mar. 11, 2024).

<sup>116</sup> Diversity and Inclusion in Clinical Trials Breakthroughs for All, *supra* note 114.

<sup>117</sup> Luther T. Clark et al., *Increasing Diversity in Clinical Trials: Overcoming Critical Barriers*, 44 *Current Probs. Cardiology* 148, 153 (May 2019).

<sup>118</sup> Pfizer, *Reducing Healthcare Inequities for Black Women with Breast Cancer*, YouTube (June 23, 2022), <https://www.youtube.com/watch?v=UXDQjOPaXWA>; Pfizer, *Guidance and Support Throughout the Clinical Trial Process*, <https://www.pfizerclinicaltrials.com/about/guidance-and-support-throughout-clinical-trial-process#:~:text=Tigerlily%20ofoundation&text=How%20We%20Work%20Together%20%3A%20Together,fostering%20inclusivity%20in%20clinical%20trials> (last visited Mar. 11, 2024).

<sup>119</sup> *Reducing Healthcare Inequities for Black Women with Breast Cancer*, *supra* note 118; *Guidance and Support Throughout the Clinical Trial Process*, *supra* note 118.

<sup>120</sup> Cynthia M. Killough, et al., *Community Health Worker Insights on Promoting Research Engagement with Diverse Populations*, 10 *Frontiers in Public Health* 959504 (2022).

example, reaching Hispanic patients by providing information in Spanish and through Spanish-language media outlets). Pfizer also provides written materials to the site in the languages that the site determines necessary.<sup>121</sup>

- Pfizer has taken several steps to address some of the financial challenges that may serve as a barrier to participation in clinical trials. For example, to address transportation-related barriers to clinical trial participation, Pfizer is conducting some decentralized trials that reduce the need for participants to travel to a trial site. A decentralized clinical trial might permit some lab work to be done at the participant's home or at a local pharmacy, for example, or it might eliminate the need for participants to travel by using mobile clinics that can travel to rural areas. Pfizer also provides support to participants by offering to cover reasonable expenses and transportation costs related to trial participation for all trials.

Pfizer observed increased diversity in participants enrolled in its studies across therapeutic areas in 2023. Pfizer recognizes, however, that more work remains to be done. Three therapeutic areas reached their goals with respect to the recruitment of Hispanic participants in the second half of 2023, while two other therapeutic areas did not. Only one therapeutic area met its goal for recruitment of Black participants during the second half of 2023.

### **c) Steps to Increase Diversity Among Clinical Trial Sites and Investigators**

Studies have emphasized the importance of building inclusive trial infrastructure in underserved communities not only to enable more diverse participation but also to accelerate the adoption of medical advances in such communities.<sup>122</sup> Multiple members of the Collective (described below) and other community partners with whom the assessment team spoke also emphasized the importance of staffing clinical trials with diverse healthcare professionals who can relate to the local community and help bring relevant skills and tools to those community members so that they can be empowered to participate in clinical trials. Additionally, the location of a clinical trial site influences whether a study is accessible to underrepresented populations.

Pfizer focuses on bringing clinical trials to sites across the country located in diverse communities, as measured by county-level census data. Pfizer defines a “diverse location” as a county where the percentage of the population that is Black, African American, or Hispanic is greater than the national average (as measured by U.S. census data). In 2022, Pfizer began a partnership with Headlands Research,<sup>123</sup> a network of 17 clinical trial sites with a focus on diversity, to operate sites in markets with significant populations of underrepresented groups:

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<sup>121</sup> Diversity and Inclusion in Clinical Trials Breakthroughs for All, *supra* note 114 (linking to Spanish language resources).

<sup>122</sup> Schwartz et al., *supra* note 101.

<sup>123</sup> Headlands Research, *Groundbreaking Headlands Research and Pfizer Partnership to Significantly Improve Diversity in Clinical Trials* (May 24, 2022), <https://headlandsresearch.com/news/groundbreaking-headlands-research-and-pfizer-partnership-to-significantly-improve-diversity-in-clinical-trials/>.

Brownsville, Texas; Atlanta, Georgia; Detroit, Michigan; and the Los Angeles, California area.<sup>124</sup> As of October 2023, the Brownsville site completed two Pfizer trials, with over 70% of study participants identifying as Hispanic or Latino in both trials.

In 2023, Pfizer began tracking its progress by therapeutic area toward its diverse site selection goals for Black and Hispanic participants. From the first to the second half of 2023, Pfizer observed increased diversity in site selection across therapeutic areas. Three of five therapeutic areas met their site selection goals for Hispanic participants during the second half of 2023. Two of five therapeutic areas met their site selection goals for Black participants during this period.

Pfizer has made efforts to broaden its pipeline of potential clinical trial investigators. The Head of Clinical Trial Diversity works with field medical directors from Pfizer's Medical Affairs team to help identify qualified investigators who are members of racial minority groups and who are interested in participating in Pfizer sponsored clinical trial research. Pfizer has also seconded field medical directors to clinical trial diversity roles. These secondees returned to their field medical director positions after spending a year focused on clinical trial diversity, bringing back to their work the perspective and skills they gained through participation in the secondment.

## **2. Institute of Translational Equitable Medicine & Global Medical Grants Program**

In November 2021, Pfizer launched the Institute of Translational Equitable Medicine ("ITEM") under the Office of the Chief Medical Officer<sup>125</sup> to bring together individuals from across Pfizer's organization to gather and use data to better understand the root causes of health inequities.<sup>126</sup> In January 2023, ITEM became part of the Global Medical Grants ("GMG") program, which funds external research and educational initiatives.<sup>127</sup>

ITEM's initiatives span three key dimensions—research, development, and clinical care. Since joining the GMG program, ITEM developed a strategic framework to guide its prioritization of resources, and another framework for selecting specific initiatives to fund that align with ITEM's strategic priorities.<sup>128</sup> ITEM is currently focused on several "Wave 1 projects" selected using these frameworks.

Through one of its Wave 1 projects, ITEM developed a "heat map" highlighting areas in which more research is needed on disparities in disease rates and severity among racial and ethnic groups. To generate the heat map and evaluate disparities, Pfizer's Global Medical Epidemiology team conducted and published a literature review of publications across 38 conditions, grouped into the categories of oncology, inflammation and immunology, internal

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<sup>124</sup> Headlands Research, *Headlands Sites*, <https://headlandsresearch.com/headlands-sites/> (last visited Mar. 11, 2024). Pfizer helped Headlands open two new clinical trial sites, in Brownsville and Detroit, and expand capacity in existing Headlands sites in Atlanta and the Los Angeles area.

<sup>125</sup> 2021 ESG Report at 24. ITEM is primarily global in scope.

<sup>126</sup> *Id.*

<sup>127</sup> Pfizer Global Medical Grants, *supra* note 2.

<sup>128</sup> When selecting initiatives, ITEM considers whether an initiative would contribute significantly to the expansion of the current literature, analyzes the expected impact on health equity, and considers the feasibility of the initiative and whether outcomes are measurable.

medicine, rare disease, and vaccines.<sup>129</sup> The report found that existing studies on disease differences between populations often overlooked analysis of disease severity differences in favor of analyzing disease rates.<sup>130</sup> The report also determined that data on Hispanic individuals was far more limited than data on Black or African American individuals, that data about Asian Americans was difficult to interpret because the group comprises a complex population with ancestries from diverse regions, and that what little data existed for Native Americans, Hawaiians, and Pacific Islanders was often aggregated in a way that made it difficult to review.<sup>131</sup> The report called for others to continue to address gaps in collective knowledge of the disparities landscape, and to begin deeper research into the ripest areas for intervention to lessen these disparities.<sup>132</sup> ITEM is in the process of publishing an update to this heat map that draws on a broader array of data.

Other Wave 1 projects include partnerships with external organizations. For example, ITEM is collaborating with the Fox Chase Cancer Center and Sylvester Comprehensive Cancer Center to conduct a cancer study to better understand the genetic drivers of cancer and identify key socioeconomic and lifestyle factors influencing cancer outcomes among people of African ancestry.<sup>133</sup> The organizations are working to build a clinicogenomic registry of biological specimens from people of African ancestry diagnosed with breast and prostate cancer.<sup>134</sup>

ITEM also hosted a daylong Health Equity Summit in May 2023. Approximately 35 participants attended the Summit, the majority of whom were external to Pfizer. The Summit featured a session on research disparities relating to inflammatory bowel disease (“IBD”) and a session on clinical care and disparity gaps. As a result of the Summit, ITEM issued two requests for grant proposals. The first request supported projects that provide educational and counseling resources to patients diagnosed with immune-inflammatory diseases. The second request for grant proposals supports research initiatives focused on improving IBD management among underserved groups, quantifying the socioeconomic and psychological burden of IBD and its correlation with SDOH, and tailoring medical treatment to individual patients (known as precision medicine). At the time of publication, Pfizer was working to finalize grant awards related to the second request.

### **C. Equitable Health Outcomes**

Pfizer’s Pillar 2 initiatives also focus on promoting equitable health outcomes through several other programs. Key initiatives include the Multicultural Health Equity Collective, Pfizer

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<sup>129</sup> Mark R. Cullen et al., *Disease-Specific Health Disparities: A Targeted Review Focusing on Race and Ethnicity*, 10 *Healthcare* 603 (2022).

<sup>130</sup> *Id.*

<sup>131</sup> *Id.*

<sup>132</sup> *Id.*

<sup>133</sup> Pfizer, Press Release, *Fox Chase Cancer Center and Sylvester Comprehensive Cancer Center Collaborate with Pfizer’s Institute of Translational Equitable Medicine to Identify Novel Genetic Drivers of Cancer Disparities in African Ancestry Populations* (Nov. 10, 2022), <https://www.pfizer.com/news/press-release/press-release-detail/fox-chase-cancer-center-and-sylvester-comprehensive-cancer>.

<sup>134</sup> *Id.*

Foundation grants, efforts to promote health literacy, and Pfizer RxPathways, each described below in greater detail.

## 1. The Multicultural Health Equity Collective

Pfizer established the Multicultural Health Equity Collective (“the Collective”) in 2014 to help improve health equity across ethnic groups and other underrepresented communities facing significant health disparities and to facilitate connections between Pfizer and external multicultural organizations.<sup>135</sup> The Collective aims to work in partnership with approximately 40 member organizations<sup>136</sup>—including patient advocacy organizations, healthcare provider associations, community groups, and legislative caucuses—to advance health equity.<sup>137</sup> For example, in partnership with Collective organizations, Pfizer has engaged in informational campaigns and participated in community events to discuss health disparities and sponsored projects aimed at addressing those disparities.<sup>138</sup>

The Pfizer Multicultural Advisory Council (“PMAC”) guides the Collective’s work. The PMAC includes leaders from 12 member organizations that help guide the work of the Collective<sup>139</sup> by engaging with Pfizer and each other on health and policy issues, and providing feedback on specific Pfizer initiatives.<sup>140</sup> For example, Pfizer asked members of PMAC to help develop and review Pfizer’s educational and outreach materials related to the clinical trial for the Pfizer-BioNTech COVID-19 vaccine, and provide input on whether the materials would be accessible to underrepresented patients. In addition, PMAC members leveraged their comprehensive communications channels to inform their constituents about the COVID-19 trial, which helped to increase participant diversity. Pfizer has also provided periodic briefings on the recruitment status and development of the vaccine trials to these organizations.<sup>141</sup>

In October 2022, the Collective, along with four partner organizations, convened a Summit to discuss health equity and optimal interventions to address systemic drivers of racial health inequities.<sup>142</sup> More than 100 leaders from across the healthcare ecosystem

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<sup>135</sup> Pfizer Multicultural Health Equity Collective, *supra* note 3; Aviso, *A New Look on the Uninsured and How Pfizer is Helping to Improve Health Equity in Multicultural Communities* at 3, <https://cdn.pfizer.com/pfizercom/A120521-LOW.pdf#page=3> [hereinafter “A New Look”].

<sup>136</sup> Pfizer Multicultural Health Equity Collective, *supra* note 3.

<sup>137</sup> *Id.*

<sup>138</sup> A New Look at 3, 14, 27. For example, Pfizer presented a 30-minute session on disparities in cancer outcomes at Black Health Matters’ BlackHistory Month Summit. *Id.* at 29. Pfizer also supported 100 Black Men of America’s Healthcare 2.0 initiative, which helps educate the public on the high morbidity and mortality rates that disproportionately affect Black people. *Id.* at 28.

<sup>139</sup> *Id.* at 18, 20.

<sup>140</sup> *Id.* at 18.

<sup>141</sup> *Id.* at 12, 18.

<sup>142</sup> The partner organizations were the Century Foundation, the National Minority Quality Forum, the Morehouse School of Medicine, and the National Association of County and City Health Officials (“NACCHO”). Pfizer Multicultural Health Equity Collective et al., *An Action Guide to Disrupt Inequitable Health Outcomes* at 4 (July 2023), <https://cdn.pfizer.com/pfizercom/ACTION-GUIDE-JUL23.pdf#page=4> [hereinafter “Action Guide”].



participated.<sup>143</sup> The Summit included discussions around solutions to advance health equity across key areas, including healthcare facilities and delivery; workforce development; and health research, data, and policy.<sup>144</sup> Several members of the PMAC who attended the Summit viewed the event as one example of the strength of Pfizer’s commitment to advancing health equity.

To build on the conclusions and insights of the Summit, Pfizer and more than 30 partners from various organizations represented at the Summit co-developed and published *An Action Guide to Disrupt Inequitable Health Outcomes* in July 2023.<sup>145</sup> The Guide proposed solutions to healthcare workforce, facility, research, and policy issues presented at the Summit.<sup>146</sup> Several members of the PMAC who attended the Summit contributed to the Guide.<sup>147</sup> Some PMAC organizations praised Pfizer’s speed and diligence in releasing the Guide less than a year after the Summit, and for moving beyond the Summit discussions to publish ideas for solutions.

To continue the work done at the Summit and through the Guide, the Collective, with support from ITEM, also released a Request for Proposal (“RFP”) on Addressing Systemic Drivers of Racial Health Inequities in July 2023 to support research, learning, and change projects on the underlying causes of health inequities, including the systems and practices that shape the distribution of resources.<sup>148</sup> Pfizer awarded a total of \$2 million through the RFP to 11 recipients. Examples of these grants include: (i) an effort by the Asian and Pacific Islander American Health Forum (“APIAHF”) to work with local and community organizations to increase vaccination rates among Asian Americans and Native Hawaiian/Pacific Islander communities; (ii) an effort by the American Academy of Physician Associates (“AAPA”) to increase representation of underrepresented and underserved minorities within the Physician Associate/Assistant profession; and (iii) an initiative by Henry Ford Health to “develop a sustainable partnership with Black/African American communities and support inclusive and equitable cancer clinical trial participation.”<sup>149</sup>

The assessment team spoke with several member organizations that participate in the Collective and the PMAC. Several PMAC member organizations told the assessment team that they benefitted from the opportunity to connect with and learn from other organizations pursuing health equity, both locally and nationally, noting that conversations between member organizations proved helpful in thinking about how health equity issues can be addressed in a collaborative and intersectional manner. PMAC members also told the assessment team that they perceived Pfizer’s work through the Collective as a reflection of the company’s commitment

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<sup>143</sup> 2022 ESG Report at 32.

<sup>144</sup> *Id.*

<sup>145</sup> Action Guide.

<sup>146</sup> *Id.* The Guide targeted an audience of healthcare industry decision makers, elected official and policymakers, and multicultural advocates and service providers. *Id.* at 4.

<sup>147</sup> *Id.* at 44–45.

<sup>148</sup> Pfizer, *Pfizer Research & Quality Improvement RFP: Addressing Systemic Drivers of Racial Health Inequities* (July 28, 2023), [https://cdn.pfizer.com/pfizercom/2023-07/GMG\\_2023-GMG-US\\_MHECITEMRFP.pdf?vSH3f3PTRKxweVBnBHML3oVzybKdIx6c=](https://cdn.pfizer.com/pfizercom/2023-07/GMG_2023-GMG-US_MHECITEMRFP.pdf?vSH3f3PTRKxweVBnBHML3oVzybKdIx6c=).

<sup>149</sup> Pfizer, *Pfizer Awards \$2M to Nonprofit Organizations Addressing Systemic Health Inequities*, <https://www.pfizer.com/news/announcements/pfizer-awards-2m-nonprofit-organizations-addressing-systemic-health-inequities> (last visited Mar. 11, 2024).

to promoting health equity. PMAC members praised the Pfizer staff who run the Collective as dedicated and engaged.

## 2. The Pfizer Foundation

Pfizer established the Pfizer Foundation (“the Foundation”) as a charitable organization in 1953 to “help build healthier communities around the world.”<sup>150</sup> Since 1953, the Foundation has provided funding for grants, charitable programs, and community-based initiatives that address global challenges.<sup>151</sup> The Foundation focuses on addressing health equity with an emphasis on strengthening healthcare systems around the world to support better health for all patients. While much of the Foundation’s work focuses outside of the United States, several programs seek to support underserved communities within the United States, including the Accelerating Health Equity Grant program and the Innovation Awards in Community Health, described further below.

### a) Accelerating Health Equity Grants

In 2020, the Foundation launched its Accelerating Health Equity Grant program, which seeks to support efforts to reduce health disparities and improve health outcomes in Black communities in the United States using a SDOH framework.<sup>152</sup> The program focuses on five key SDOH: (i) healthcare access and quality; (ii) neighborhood and built environment; (iii) social and community context; (iv) economic stability; and (v) educational access and quality.<sup>153</sup>

The Foundation first launched a one-year pilot program in 2020, providing one-time grants of \$250,000 to ten community-based organizations that help address the leading causes of mortality and morbidity in Black communities, including cardiovascular disease, diabetes, and cancer.<sup>154</sup> The Foundation evaluated the success of its grants by examining each organization’s efforts to strengthen healthcare systems, catalyze other community partnerships, and advance goals, such as patient education. Based on lessons learned from the implementation of the Accelerating Health Equity pilot in 2020, the Foundation launched a new two-year program to enhance Accelerating Health Equity’s impact. The Foundation allocated a larger budget for the new program, which enabled the Foundation to support a greater number of organizations. The new Accelerating Health Equity Grant program also shifted from focusing on the leading health causes of mortality in the Black community to a broader range of issues that impact health outcomes in those communities.

Pfizer selected a new cohort of 15 grantees to receive \$300,000 per organization over a two-year period to develop and lead solutions that help address leading causes of disparate health outcomes.<sup>155</sup> Pfizer selected grant recipients working to address specific SDOH, from

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<sup>150</sup> Pfizer, *The Pfizer Foundation*, <https://www.pfizer.com/about/responsibility/global-impact/the-pfizer-foundation> (last visited Mar. 11, 2024). The Pfizer Foundation is a separate legal entity from Pfizer Inc. *Id.*

<sup>151</sup> *Id.*

<sup>152</sup> 2021 ESG Report at 35–36.

<sup>153</sup> *Id.*

<sup>154</sup> *Id.* at 36.

<sup>155</sup> 2022 ESG Report at 30.

health literacy to language barriers to lack of transportation.<sup>156</sup> One grantee told the assessment team that Pfizer's grant allowed the organization to hire more staff members to hand-deliver supplies, provide transportation to medical appointments, and host live educational events for the local community.

Grant recipients included organizations led by individuals with firsthand experience with certain disease states, who design and lead interventions in their own communities. For example, one grantee provides community-based HIV care and support services for Black women living with HIV that were developed, facilitated, and run by Black women who are themselves living with HIV and were trained as community health workers.

Pfizer engaged a third-party consultant to evaluate the program during its second year. The study concluded that collectively, grantees in the Accelerating Health Equity portfolio provided healthcare services, such as mammograms, information, such as nutrition education, and emotional support, such as support groups, to over 900,000 community members in the first nine months of programming, which met or exceeded the original service objectives as a group. Pfizer also reported that the grantees' community outreach and education efforts reached nearly 830,000 individuals and that over 15,000 patients received support to access direct healthcare services. Multiple grantee organizations told the assessment team that Pfizer's grant marked a turning point in allowing their organizations to increase their staff numbers, raise their profile, and begin partnering with other pharmaceutical companies, government organizations, and non-profit groups to scale their efforts to address SDOH.

In addition to providing funding to grantees, the Accelerating Health Equity Grant program aims to enable grantee organizations to collaborate on health equity initiatives. As of October 2023, the first cohort of grantees had met twice in person and twice virtually. Grantee organizations told the assessment team that the opportunity to exchange ideas and share information with other grant recipients had been helpful. Several organizations told the assessment team that they partnered with a fellow grantee organization on one or more initiatives to address SDOH after being introduced by Pfizer,<sup>157</sup> or sought the assistance of other Pfizer community partner organizations to drive local engagement around one of their initiatives in different areas around the country. One grantee organization also reported that engaging with Pfizer employees, such as through site visits to bring grantee organization and Pfizer leaders together, had a positive impact on their own work. Several grantee organizations commented that Pfizer might consider longer term grant commitments to build on the work organizations have achieved to date, and that progress on health equity would require sustained efforts.

## **b) Innovation Awards in Community Health**

In 2020, the Foundation launched Innovation Awards in Community Health, in partnership with the nonprofit humanitarian organization Direct Relief, to help improve health outcomes among historically underserved communities in the United States.<sup>158</sup> The program provided funding over two years to its initial cohort of 11 U.S. safety-net community healthcare

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<sup>156</sup> *Id.*

<sup>157</sup> For example, three grantee organizations have partnered to develop an integrated, unified patient intake process and tool.

<sup>158</sup> The Pfizer Foundation, *supra* note 150; Pfizer, *Celebrating Innovation in Community Health*, YouTube (July 19, 2023), <https://www.youtube.com/watch?v=RBDRO2bAbD8>.

providers.<sup>159</sup> Safety net providers typically offer medical services to high numbers of uninsured and Medicaid patients, who are disproportionately members of underrepresented racial groups.<sup>160</sup> The first iteration of the program focused on infectious disease and supported innovative approaches to infectious disease education, screening, testing, treatment, and care.<sup>161</sup> For example, recipient health centers implemented mobile vans and pop-up clinics, telehealth technology, and standardized care using electronic health records.<sup>162</sup>

In 2023, the Foundation launched an expanded two-year program and planned to provide the new cohort of 19 organizations with a total of \$5 million in funding. Building upon the Foundation's experience with the first iteration of the program, the new RFP focused on vaccine-preventable illness, which the Foundation determined was the most successful area of focus within its first cohort. The new RFP focused on vulnerable geographic regions with high rates of infectious disease (as determined by an analysis of several markers for the strength of infectious diseases throughout several geographic areas).

### 3. Health Literacy

Racial and ethnic minorities are among the populations that are most likely to experience difficulties finding, understanding, and using information to inform health-related decisions for themselves and others.<sup>163</sup> The CDC refers to this capacity as "personal health literacy."<sup>164</sup> Pfizer's efforts to mitigate the effects of low health literacy predate development of the company's 2021 DEI strategy. In 2005, Pfizer helped develop the Newest Vital Sign, a screening tool used by healthcare professionals to calibrate their communications with particular patients' health literacy levels.<sup>165</sup> As part of its more recent efforts to help address SDOH, Pfizer has implemented several efforts to promote health literacy among those most likely to be unfamiliar navigating the U.S. healthcare system. These efforts include:

- Publishing a health literacy position paper in 2021, which underscored positive public health impacts associated with increasing health literacy and publicly affirmed Pfizer's responsibility to help improve health literacy in underserved communities;<sup>166</sup>

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<sup>159</sup> 2021 ESG Report at 20, 36.

<sup>160</sup> Paula Moura, *What is a Safety-Net Hospital and Why is it so Hard to Define?*, Frontline, PBS (May 18, 2021), <https://www.pbs.org/wgbh/frontline/article/what-is-a-safety-net-hospital-covid-19/>; Breauna Branch & Douglas Conway, *U.S. Census Bureau, Health Insurance Coverage by Race and Hispanic Origin: 2021* at 3 (Nov. 2022), <https://www.census.gov/content/dam/Census/library/publications/2022/acs/acsbr-012.pdf>.

<sup>161</sup> 2022 ESG Report at 30.

<sup>162</sup> *Id.*

<sup>163</sup> Sasha A. Fleary & Reynolette Ettienne, *Social Disparities in Health Literacy in the United States*, 3 *Health Literacy Research and Practice* 47, 47–48 (2019).

<sup>164</sup> Centers for Disease Control and Prevention, *What is Health Literacy?* (July 11, 2023), <https://www.cdc.gov/healthliteracy/learn/index.html>.

<sup>165</sup> Pfizer, *The Newest Vital Sign*, <https://www.pfizer.com/products/medicine-safety/health-literacy/nvs-toolkit> (last visited Mar. 11, 2024).

<sup>166</sup> Pfizer, *Pfizer Health Literacy Position Statement*, [https://cdn.pfizer.com/pfizercom/Pfizer\\_Health\\_Literacy\\_Position\\_Paper.pdf](https://cdn.pfizer.com/pfizercom/Pfizer_Health_Literacy_Position_Paper.pdf).

- Publishing patient-facing literacy guides on how patients can advance their own knowledge, harness patient-centric technology such as telemedicine, and find patient advocacy organizations that can help patients better understand their health;<sup>167</sup>
- Publishing plain language information about Pfizer’s clinical trials on Pfizer’s “Find a Trial” page, targeted toward potential clinical trial participants;<sup>168</sup>
- Funding health literacy research and evidence-based studies to improve the quality and subsequent outcomes associated with healthcare information, including a recent study conducted in 2023 which found that the use of plain language, patient-centered infographics may enhance patient awareness and early detection of cardiac amyloidosis;<sup>169</sup> and
- Partnering with Triage Cancer—a cancer patient advocacy group—to develop a website and online learning curriculum for patients that provides easy-to-understand healthcare finance and insurance literacy resources.<sup>170</sup>

Pfizer has also provided grant funding to other organizations to promote health literacy. For example, Pfizer sponsors the National Academies of Science, Engineering, and Medicine’s Roundtable on Health Literacy<sup>171</sup> and has also entered into strategic partnerships with organizations such as Harvard University’s Multi-Regional Clinical Trial Center, which aims to increase health literacy in clinical trials globally.<sup>172</sup> A member of the PMAC with whom the assessment team met specifically praised Pfizer for its efforts to communicate clear information to patients.

#### 4. Pfizer RxPathways

Pfizer RxPathways provides resources to connect eligible patients to a range of programs that offer Pfizer medication for free or at a reduced out-of-pocket cost for patients.<sup>173</sup> Pfizer RxPathways is intended to enhance patients’ ability to access treatment. Between 2018

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<sup>167</sup> Pfizer, *Making the Most of Patient Centricity, How to Be an Empowered, Engaged Patient*, <https://www.pfizer.com/patient-centricity-ebook> (last visited Mar. 11, 2024).

<sup>168</sup> Pfizer, *Find a Clinical Trial*, <https://www.pfizerclinicaltrials.com/find-a-trial> (last visited Mar. 11, 2024).

<sup>169</sup> Allison P. Pack et al., *Developing, Optimizing, and Evaluating Patient Infographics for Diagnosing Cardiac Amyloidosis*, 3 PEC Innovation 1, 4–6 (Sept. 12, 2023).

<sup>170</sup> MyHealthcareFinances, *About Us*, <https://www.myhealthcarefinances.com/> (last visited Mar. 11, 2024).

<sup>171</sup> National Academies of Science, Engineering, and Medicine, *Roundtable on Health Literacy*, <https://www.nationalacademies.org/our-work/roundtable-on-health-literacy#sectionSponsors> (last visited Mar. 11, 2024).

<sup>172</sup> Pfizer Health Literacy Position Statement, *supra* note 166.

<sup>173</sup> Pfizer RxPathways, *Resources For Patients*, <https://www.pfizerRxPathways.com/resources/patients> (last visited Mar. 11, 2024). Pfizer RxPathways is supported by Pfizer Inc. and the Pfizer Patient Assistance Foundation and eligibility for patient support offerings may vary based on a number of factors including whether a patient is insured, whether they have government or private insurance, and income level and other factors. *Id.*



and 2022, RxPathways helped hundreds of thousands of patients receive millions of Pfizer prescriptions for free or at a savings.<sup>174</sup>

While Pfizer did not design RxPathways specifically to benefit those in underrepresented communities, Pfizer works with several third-party organizations, including those that focus on addressing racial health disparities, to help patients learn about and utilize its assistance programs. For example, Pfizer worked with the National Hispanic Medical Association, the Dominican Women’s Development Center, and the National Congress of American Indians to increase awareness of RxPathways so that these organizations could more effectively help their constituent populations learn about the available programs and help eligible patients access Pfizer’s medicines for free or at a reduced cost.<sup>175</sup> Pfizer also co-hosted webinars and distributed information to explain how RxPathways can benefit patients with organizations such as the American Association of Physicians of Indian Origin and Black Health Matters.<sup>176</sup> Pfizer also aims to increase awareness of RxPathways in underserved and underrepresented communities by presenting information about the program at conferences run by organizations committed to promoting health equity, such as the National Organization of Black Elected Legislative Women.<sup>177</sup>

#### **D. Removing Barriers to Access**

Pillar 2 also includes Pfizer’s efforts to remove barriers to accessing medicines. Although significant components of Pfizer’s Pillar 2 strategy are global,<sup>178</sup> Pfizer works with key stakeholders in the U.S. healthcare system including payers, governments, patient advocacy groups, community leaders, and others, to help improve access and reduce costs for patients in

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<sup>174</sup> Pfizer has sought to increase accessibility to its RxPathways program. Patients can apply to participate in the program through the Patient Assistance Tool or through an online enrollment option, Pfizer PAP Connect. See Pfizer RxPathways, *Resources*, <https://www.pfizer-rxpathways.com/> (last visited Mar. 11, 2024); Pfizer RxPathways, *Pfizer PAP Connect*, <https://www.pfizer-rxpathways.com/pfizer-pap-connect> (last visited Mar. 11, 2024). The Patient Assistance Tool also allows patients to easily view which medications are available for free or at discount. Patients can also use the PAP Connect platform to request certain primary care medications. Pfizer provides an end-to-end online process to promote accessibility for individuals who are unable to visit their healthcare providers in person. The RxPathways website features brochures for patients that aggregate information about healthcare resources that may be available to them. These resources cover information on Pfizer’s own programs and on other third-party resources, such as accessing government programs or connecting with patient advocacy organizations. For those who may not be able to access the website, a designated hotline is available to assist new patients in applying for the program and to assist current patients with queries they may have. See Pfizer RxPathways, *Resources*, <https://www.pfizer-rxpathways.com/> (last visited Mar. 11, 2024); Pfizer RxPathways, *Pfizer PAP Connect*, <https://www.pfizer-rxpathways.com/pfizer-pap-connect> (last visited Mar. 11, 2024).

<sup>175</sup> A New Look at 30, 32.

<sup>176</sup> *Id.* at 28–29.

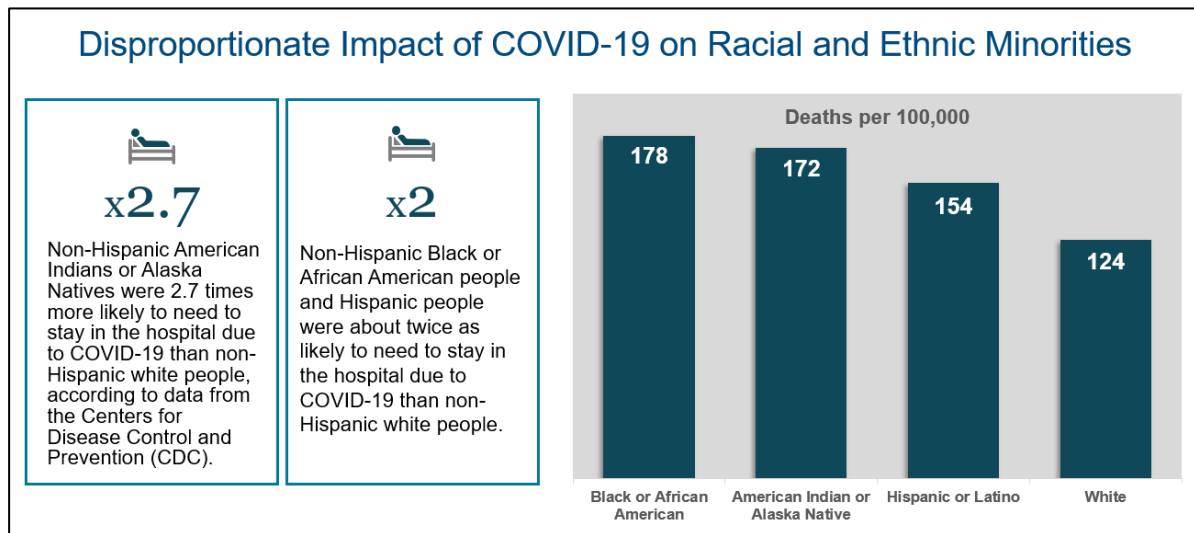
<sup>177</sup> *Id.* at 29–30, 33.

<sup>178</sup> For example, through its “An Accord for a Healthier World” Pfizer provides lower-income countries with access to certain medicines on a not-for-profit basis. Pfizer, *An Accord for a Healthier World*, <https://www.pfizer.com/about/responsibility/global-impact/accord> (last visited Mar. 11, 2024). Through the Accord, Pfizer’s full portfolio of medicines and vaccines for which it has global rights is available on a not-for-profit basis to 45 lower-income countries. *Id.* While the Accord is a key component of Pfizer’s overall Pillar 2 strategy, Covington did not review the Accord during this assessment, which focused on Pfizer’s efforts in the United States.

the United States. To explore concrete examples of this work, the assessment team examined Pfizer’s approach to three diseases with disparate racial impacts—COVID-19, breast cancer, and prostate cancer.

## 1. COVID-19

Disparities among racial and ethnic groups with respect to rates of infection, hospital stays, and death caused by the COVID-19 are well documented. According to data from the CDC, as depicted below,<sup>179</sup> Non-Hispanic American Indians or Alaska Natives, Non-Hispanic Black or African Americans, and Hispanic people were two to three times more likely to require a hospital stay due to COVID-19 than non-Hispanic white people.<sup>180</sup> In addition, as illustrated in the graph below,<sup>181</sup> the mortality rate for COVID-19 for Black or African American, American Indian or Alaska Native, and Hispanic or Latino individuals was also higher as of March 2021.<sup>182</sup>



Racial and ethnic minority populations were also less likely to be vaccinated against the disease, in part because of skepticism regarding medical research among some members of minority communities.<sup>183</sup> A meta-analysis of 33 studies on racial and ethnic minorities’ acceptance of COVID-19 vaccines found that minorities expressed concerns that the process of vaccine creation was “rushed,” evinced distrust of healthcare systems and the government, and expressed fears that they might be unwilling subjects of experiments.<sup>184</sup>

<sup>179</sup> Mayo Clinic, *COVID-19 Infections by Race: What’s Behind the Health Disparities?* (Oct. 6, 2022), <https://www.mayoclinic.org/diseases-conditions/coronavirus/expert-answers/coronavirus-infection-by-race/faq-20488802>.

<sup>180</sup> *Id.*

<sup>181</sup> The data reflected in the bar graph is derived from The Atlantic’s COVID Racial Data Tracker. The Atlantic, *The COVID Racial Data Tracker* (Mar. 7, 2021), <https://covidtracking.com/race>.

<sup>182</sup> *Id.*

<sup>183</sup> Mohammed Abba-Aji et al., *Ethnic/Racial Minorities’ and Migrants’ Access to COVID-19 Vaccines: A Systemic Review of Barriers and Facilitators*, 5 *J. of Migration and Health* 100086 (2022).

<sup>184</sup> *Id.*

In connection with its COVID-19 response efforts, Pfizer helped address health equity through three principal areas: (i) vaccine trials, (ii) the dissemination of accurate vaccine information, and (iii) vaccine access. With respect to clinical trial diversity, in the Phase 3 clinical trial for the Pfizer-BioNTech COVID-19 vaccine, approximately 10% of U.S. participants were Black and 13% were Hispanic or Latino.<sup>185</sup>

FDA authorized the Pfizer-BioNTech COVID-19 vaccine for emergency use on December 11, 2020.<sup>186</sup> Once the vaccine became available, Pfizer worked to educate patients and healthcare providers through social media campaigns, television campaigns, and other avenues about how to combat COVID-19. Specifically, Pfizer provided information on safe storage and reconstitution of the vaccine, safe administration of the vaccine, and the disease burden of COVID-19 on society. Pfizer also partnered with numerous national and community-based organizations to promote the dissemination of accurate information about the vaccine and its efficacy to underrepresented communities.<sup>187</sup> Pfizer conducted multiple webinars for public health officials and clinicians with its Vaccines team; participated in conference panels dedicated to vaccine confidence, including panels with the National Hispanic Medical Association (“NHMA”), the Congressional Hispanic Caucus Institute (“CHCI”), and the National Medical Association (“NMA”); and collaborated with national partners on specific educational and outreach campaigns.<sup>188</sup> Examples of collaborations included:

- Partnering with the Hispanic Federation and La Red Hispana to produce a virtual health fair in which Latino healthcare providers and other experts provided information in Spanish through Facebook, YouTube, and radio broadcasts in New York City, San Francisco, and Tucson about COVID-19 and how listeners could access free screenings and medicines through Pfizer RxPathways and other patient assistance programs;<sup>189</sup>
- Partnering with the National Black Nurses Association (“NBNA”) to launch a campaign targeting Black nurses and the Black community across the United States to reduce the amount of misinformation about vaccines by providing facts about their benefits,<sup>190</sup> and another campaign to offer Black nurses—a group of health workers disproportionately affected by COVID-19 infections, hospitalizations, and deaths<sup>191</sup>—a mental wellness program that included counseling and education webinars;<sup>192</sup> and

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<sup>185</sup> Pfizer, *About our Landmark Trial*, <https://www.pfizer.com/science/coronavirus/vaccine/about-our-landmark-trial> (last visited Mar. 11, 2024).

<sup>186</sup> U.S. Dep’t of Health and Human Services, *COVID-19 Vaccine Milestones*, <https://www.hhs.gov/coronavirus/covid-19-vaccines/index.html> (last visited Mar. 11, 2024).

<sup>187</sup> A New Look at 14, 16, 30–32.

<sup>188</sup> *Id.* at 14, 30–33.

<sup>189</sup> *Id.* at 16.

<sup>190</sup> *Id.* at 17.

<sup>191</sup> Samantha Artiga et al., *COVID-19 Risks and Impacts Among Health Care Workers by Race/Ethnicity*, KFF (Nov. 11, 2020), <https://www.kff.org/report-section/covid-19-risks-and-impacts-among-health-care-workers-by-race-ethnicity-issue-brief/>.

<sup>192</sup> A New Look at 17.

- Working with grassroots organization Día de la Mujer Latina to share accurate vaccine information through the organization's No Más, No More campaign,<sup>193</sup> which advocates for culturally and linguistically appropriate educational efforts to address COVID-19 misinformation.<sup>194</sup>

Pfizer also took steps to make the vaccines available to underrepresented communities. Pfizer established an internal team dedicated to vaccine equity which worked with community members and organizations, such as church leaders and health centers, to understand how Pfizer could better educate members of those communities about the COVID-19 vaccines. For example, Pfizer aimed to understand what languages were spoken in a particular community so that it could provide materials in the appropriate languages. Pfizer also solicited input from these community partners about whether its materials and the method of delivery (i.e., social media, announcements from a public figure) effectively communicated the relevant content.

Apart from developing and distributing the Pfizer-BioNTech vaccine, Pfizer took other steps to promote health equity in connection with the pandemic. For example, Pfizer worked with Día de La Mujer Latina to train community health workers to conduct contact tracing and help patients navigate telehealth in response to COVID-19.<sup>195</sup> Pfizer also partnered with humanitarian organization Direct Relief to donate tens of thousands of units of antibiotics and vasopressor therapies for Direct Relief's COVID-19 ICU Rx Modules, which enabled treatment for patients with serious COVID-19 infections suffering from bacterial infections.<sup>196</sup>

Several external organizations with whom the assessment team spoke praised Pfizer for its development of the Pfizer-BioNTech COVID-19 vaccine and subsequent communications. Several external partners told the assessment team that Pfizer had worked closely with them during the COVID-19 pandemic on various response activities, including efforts to diversify clinical trials and translate educational materials.<sup>197</sup> Several organizations also noted that Pfizer had longstanding partnerships with community-based organizations and a history of attending community-based events which, once the COVID-19 pandemic began, allowed Pfizer to leverage the trust it had built to spread accurate information about COVID-19.

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<sup>193</sup> *Id.* at 30.

<sup>194</sup> Día de la Mujer Latina, *No Más, No More*, <https://www.diadelamujerlatina.org/no-mas-no-more/> (last visited Mar. 11, 2024).

<sup>195</sup> Día de la Mujer Latina, *Promotores/CHW Training*, <https://www.diadelamujerlatina.org/promotores/> (last visited Mar. 11, 2024); A New Look at 30.

<sup>196</sup> A New Look at 25.

<sup>197</sup> *Id.* at 11 (“Pfizer leveraged The Collective as the point of contact and source of information for multicultural groups. The Collective’s partner organizations were the points of contact for communities of color to receive culturally appropriate information about the COVID-19 clinical trials. This information included but was not limited to 1) informational sessions on what is Messenger RNA; 2) COVID-19 vaccine’s clinical trial process; 3) including minority participation in the clinical trials; 4) COVID-19 vaccine supply chain, including storage and access; and 5) development of culturally appropriate materials on vaccine hesitancy.”).

## 2. Breast Cancer

Breast cancer is the most common cancer among women in the United States,<sup>198</sup> accounting for 30% of all new cancer diagnoses in women,<sup>199</sup> and causing approximately 40,000 deaths annually.<sup>200</sup> Although white women have a higher incidence of breast cancer than Black women, mortality rates for Black women meet or exceed those of white women.<sup>201</sup>

Research has found that one cause of this disparity is lack of preventative care, early screenings, and early intervention.<sup>202</sup> African Americans, Hispanics/Latinos, and American Indians/Alaskan Natives are disproportionately diagnosed with advanced stage breast cancer compared to white and Asian American/Pacific Islander women.<sup>203</sup> Studies have shown, however, that five-year survival rates for breast cancer among Black and white women were roughly equal when both groups received periodic screenings at the same rate.<sup>204</sup> Other causes of the racial disparity in outcomes include treatment affordability and other barriers to accessing care, such as lack of transportation.<sup>205</sup> The National Cancer Institute calculated the average cost of medical care and drugs to treat breast cancer as up to \$67,400 in the year following a cancer diagnosis.<sup>206</sup> According to an American Cancer Society report from 2020, people of color are more likely to experience financial hardship related to costs of cancer treatment.<sup>207</sup> Studies have also shown that Black and Hispanic patients, in particular, reported that barriers such as distance to the treatment center and lack of access to transportation, were

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<sup>198</sup> James J. Dignam PhD., *Differences in Breast Cancer Prognosis Among African-American and Caucasian Women*, American Cancer Society Journal (Jan. 2000), <https://acsjournals.onlinelibrary.wiley.com/doi/10.3322/canjclin.50.1.50>.

<sup>199</sup> Rebecca L. Siegel et al., *Cancer Statistics, 2019*, American Cancer Society Journals (Jan. 8, 2019), <https://acsjournals.onlinelibrary.wiley.com/doi/10.3322/caac.21551>.

<sup>200</sup> Dignam, *supra* note 198.

<sup>201</sup> ACS Medical Content and News Staff, *More Black Women Die From Breast Cancer Than Any Other Cancer*, American Cancer Society (Feb. 14, 2022), <https://www.cancer.org/research/acs-research-news/facts-and-figures-african-american-black-people-2022-2024.html>. The American Cancer Society reports that Black women are 41% more likely to die from breast cancer than white women. *Id.*

<sup>202</sup> Dignam, *supra* note 198.

<sup>203</sup> Elizabeth Ward PhD. et al., *Cancer Disparities by Race/Ethnicity and Socioeconomic Status*, American Cancer Society (Mar. 2004), <https://acsjournals.onlinelibrary.wiley.com/doi/10.3322/canjclin.54.2.78>.

<sup>204</sup> *Id.*

<sup>205</sup> More Black Women Die From Breast Cancer Than Any Other Cancer, *supra* note 201.

<sup>206</sup> Angela Mariotto et al., *Medical Care Costs Associated With Cancer Survivorship in the United States*, 29 *Cancer, Epidemiology & Biomarkers & Prevention* 1304, 1306 (July 1, 2020), <https://aacrjournals.org/cebip/article/29/7/1304/72361/Medical-Care-Costs-Associated-with-Cancer>; Noam Levey, *She Was Already Battling Cancer. Then She Had to Fight the Bill Collectors*, NPR (July 9, 2022), <https://www.npr.org/sections/health-shots/2022/07/09/1110370391/cost-cancer-treatment-medical-debt>.

<sup>207</sup> Cancer Action Network, *The Costs of Cancer 2020 Edition*, (Oct. 2020), <https://www.fightcancer.org/sites/default/files/National%20Documents/Costs-of-Cancer-2020-10222020.pdf> (63.5% of people of color experienced financial hardship versus 50.9% of non-Hispanic whites).



potentially significant barriers to care, even though white patients, on average, had to travel further distances to the facilities.<sup>208</sup>

One component of Pfizer's efforts to address this disparity is Pfizer Oncology Together, a program for patients who have been prescribed medication or treatment plans that may include Pfizer's products.<sup>209</sup> Pfizer Oncology Together has a Co-Pay Savings program that helps patients reduce their out-of-pocket costs for Pfizer medicines by covering a portion of these costs.<sup>210</sup> Pfizer has also taken steps to address the logistical challenges patients face in obtaining cancer treatment by connecting patients with assistance relating to transportation and lodging for treatment-related appointments.<sup>211</sup>

Pfizer also provided financial support to organizations that help breast cancer patients access preventative care and treatment more broadly. For example, the Foundation awarded an Accelerating Health Equity grant to an organization that provides access to breast cancer diagnostic care and covers the cost of treatment services for low income, uninsured, and underinsured individuals in north Texas. The organization used the funding to expand outreach and provide early detection services to African American women, who previously had not constituted as significant a percentage of the organization's target population.

In addition to helping address economic barriers to treatment, Pfizer also provides various resources to help address barriers relating to education and health literacy. For example:

- The website for Ibrance, one of Pfizer's breast cancer medications, includes doctor discussion guides that patients can use to plan out what questions to ask at their next doctor's appointment.<sup>212</sup> It also contains a plain language Patient Guide that provides a comprehensive overview of the medicine.<sup>213</sup>

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<sup>208</sup> Jeffrey J. Guidry et al., *Transportation as a Barrier to Cancer Treatment*, 5 *Cancer Practice* 361 (1997).

<sup>209</sup> Pfizer Oncology Together, <https://www.pfizeroncologytogether.com/index.html> (last visited Mar. 11, 2024).

<sup>210</sup> Pfizer Oncology Together, *Learning About Financial Assistance. Together.*, <https://www.pfizeroncologytogether.com/patient/financial-assistance> (last visited Mar. 11, 2024).

<sup>211</sup> Pfizer Oncology Together, *Pfizer Oncology Together Co-Pay Savings Program (Oral Products)*, <https://www.pfizeroncologytogether.com/terms> (last visited Mar. 11, 2024); Pfizer Oncology Together, *Downloadable Resources*, <https://www.pfizeroncologytogether.com/patient/personalized-support#downloadable-resources> (last visited Mar. 11, 2024).

<sup>212</sup> Ibrance, *Patient and Caregiving Resources: Questions To Ask Your Doctor*, <https://www.ibrance.com/patient-support/talk-doctor> (last visited Mar. 11, 2024).

<sup>213</sup> Ibrance, *Patient Guide* (Mar. 2023), <https://www.ibrance.com/assets/pdf/pp-ibr-usa-5531-patient-guide-digital-eng-revised-042023.pdf>.

- Pfizer's Oncology Together website contains a number of resources for patients, including guides to Pfizer Oncology Patient Access,<sup>214</sup> common health insurance terms,<sup>215</sup> patient billing,<sup>216</sup> and more.
- As described above, Pfizer also developed MyHealthcareFinances.com in partnership with Triage Cancer to provide educational resources regarding healthcare finance and insurance to cancer patients and caregivers.
- Pfizer's This Is Living With Cancer ("Living With Cancer") mobile application and website, established in 2017, aim to help patients and caregivers manage everyday challenges associated with a cancer diagnosis and reduce barriers to treatment.<sup>217</sup> LivingWith—the mobile application—is available for free<sup>218</sup> and allows patients to build support networks; record information from visits with physicians; track their symptoms; and store documents.<sup>219</sup> The Living with Cancer website provides specific health education on different kinds of cancer, including metastatic breast cancer ("MBC").<sup>220</sup> For example, the platform features fact sheets on how to join breast cancer clinical trials;<sup>221</sup> the MBC Dictionary, which defines key MBC terms to reduce confusion during patient interactions with physicians;<sup>222</sup> and a guide that helps Latinas with MBC learn how to better understand their diagnosis.<sup>223</sup>

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<sup>214</sup> Pfizer Oncology Together, *Accessing Your Pfizer Oncology Medicine Together* (Apr. 2023), [https://www.pfizeroncologytogether.com/files/Pfizer\\_Oncology\\_Patient\\_Access\\_Guide.pdf](https://www.pfizeroncologytogether.com/files/Pfizer_Oncology_Patient_Access_Guide.pdf).

<sup>215</sup> Pfizer Oncology Together, *Understanding Insurance Plans and Terms Together* (Nov. 2022), [https://www.pfizeroncologytogether.com/files/Health\\_Insurance\\_Terms\\_Guide.pdf](https://www.pfizeroncologytogether.com/files/Health_Insurance_Terms_Guide.pdf).

<sup>216</sup> Pfizer Oncology Together, *Patient Medical Billing Map for Pfizer Oncology Injectable and Infusion Medicines* (Dec. 2021), <https://www.pfizeroncologytogether.com/files/Patient-Medical-Billing-Map.pdf>.

<sup>217</sup> Pfizer, *Pfizer Launches Novel Programs to Put Important Support Services at the Fingertips of Cancer Patients* (Oct. 5, 2017), [https://www.pfizer.com/news/press-release/press-release-detail/pfizer\\_launches\\_novel\\_programs\\_to\\_put\\_important\\_support\\_services\\_at\\_the\\_fingertips\\_of\\_cancer\\_patients](https://www.pfizer.com/news/press-release/press-release-detail/pfizer_launches_novel_programs_to_put_important_support_services_at_the_fingertips_of_cancer_patients).

<sup>218</sup> This Is Living With Cancer, *Explore LivingWith*, <https://www.thisislivingwithcancer.com/living-with-app> (last visited Mar. 11, 2024).

<sup>219</sup> Pfizer Launches Novel Programs to Put Important Support Services at the Fingertips of Cancer Patients, *supra* note 217.

<sup>220</sup> This Is Living With Cancer, *Breast Cancer*, <https://www.thisislivingwithcancer.com/cancer-type/breast> (last visited Mar. 11, 2024).

<sup>221</sup> Pfizer, *Breast and Ovarian Cancer Clinical Trials Resources* (Aug. 2023), [https://www.thisislivingwithcancer.com/sites/default/files/communication\\_tool/Breast\\_and\\_Ovarian\\_Cancer\\_Clinical\\_Trials\\_Resources\\_o.pdf](https://www.thisislivingwithcancer.com/sites/default/files/communication_tool/Breast_and_Ovarian_Cancer_Clinical_Trials_Resources_o.pdf).

<sup>222</sup> This Is Living With Cancer, *Metastatic Breast Cancer: Terms You Should Know* (May 2023), [https://www.thisislivingwithcancer.com/sites/default/files/communication\\_tool/mBC\\_Dictionary.pdf](https://www.thisislivingwithcancer.com/sites/default/files/communication_tool/mBC_Dictionary.pdf).

<sup>223</sup> This Is Living With Cancer, *With Love and Support: A Guide for Latinas with Metastatic Breast Cancer and Their Loved Ones* (May 2023), [https://www.thisislivingwithcancer.com/sites/default/files/communication\\_tool/SHARE\\_mBC\\_Novela\\_EN.pdf](https://www.thisislivingwithcancer.com/sites/default/files/communication_tool/SHARE_mBC_Novela_EN.pdf).

Pfizer also partners with organizations that promote equitable access to treatment for underrepresented breast cancer patients. For example:

- Pfizer joined the Tigerlily Foundation’s #InclusionPledge, which requires participating organizations to take actions—such as supporting efforts to reduce bias in medical treatment or increase racial and ethnic representation in the healthcare workforce<sup>224</sup>—to eliminate healthcare disparities for Black women diagnosed with breast cancer.<sup>225</sup> As described above, Pfizer and the Tigerlily Foundation developed HEAL workshops to learn more about the experience of women of color diagnosed with breast cancer and identify solutions to overcome barriers to equitable treatment, including by expanding access to health education and encouraging broader inclusivity in breast cancer clinical trials.<sup>226</sup>
- Pfizer supports When We Tri(al)—an initiative to spread awareness about the importance of clinical trials by amplifying the voices of Black women who have benefitted from their participation in clinical trials.<sup>227</sup>
- In 2020, Pfizer collaborated with the ABC Global Alliance—a non-profit association that supports projects related to advanced breast cancer (“ABC”)—to produce a repository of resources and community-based initiatives to assist global ABC and MBC patients.<sup>228</sup> For example, the repository highlights the 305 Pink Pack Cancer Support Services program, which provides support to breast cancer patients in South Florida from primarily Hispanic communities and aims to reduce barriers to accessing breast cancer treatment by offering childcare, transportation, and emotional support services.<sup>229</sup> The repository also informs patients about HOPE Retreats, which provide financial and emotional support to single mothers living with MBC below the federal poverty line and their children.<sup>230</sup> Participants receive a grocery card and speak with licensed social workers or therapists specializing in oncology while their children engage in art therapy and creative activities.<sup>231</sup>

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<sup>224</sup> The Tigerlily Foundation, *#InclusionPledge Playbook* (2022), [https://8197342.fs1.hubspotusercontent-na1.net/hubfs/8197342/Inclusion%20Pledge/Tigerlily\\_Gilead\\_Inclusion\\_Pledge\\_Playbook.pdf](https://8197342.fs1.hubspotusercontent-na1.net/hubfs/8197342/Inclusion%20Pledge/Tigerlily_Gilead_Inclusion_Pledge_Playbook.pdf).

<sup>225</sup> Pfizer & The Tigerlily Foundation, *Reducing Healthcare Inequities for Black Women: Tigerlily Foundation Partnership* (Mar. 2023), <https://www.breastcancervision.com/tigerlily-foundation>; Tigerlily Foundation, *#Inclusion Pledge* (2024), <https://race.tigerlilyfoundation.org/inclusionpledge/#pledgepartnerresults>.

<sup>226</sup> Reducing Healthcare Inequities for Black Women, *supra* note 225.

<sup>227</sup> Pfizer, *Working to Make a Difference in Breast Cancer Research*, YouTube (Feb. 28, 2023), [https://www.youtube.com/watch?v=MXOs\\_bHAYhE](https://www.youtube.com/watch?v=MXOs_bHAYhE).

<sup>228</sup> ABC Global Alliance, *Hard-To-Reach ABC/MBC Communities Toolkit*, <https://www.abcgloballiance.org/hard-to-reach-toolkit> (last visited Mar. 11, 2024).

<sup>229</sup> *Id.*

<sup>230</sup> *Id.*

<sup>231</sup> *Id.*

### 3. Prostate Cancer

Prostate cancer, which accounts for 20% of all cancers, affects more men in the United States than any other cancer and is the second highest cause of cancer-related deaths.<sup>232</sup> Prostate cancer alone accounts for nearly one in five new diagnoses of cancers in men<sup>233</sup> and is associated with significant racial disparities in outcomes and occurrences.<sup>234</sup> Black men have a 78% higher incidence of prostate cancer than non-Hispanic white men.<sup>235</sup> Black men, who also have a 2.3-times higher mortality rate than white men, are more likely to receive a prostate cancer diagnosis at a younger age, and experience more advanced-stage and aggressive disease.<sup>236</sup> Hispanic men are also more likely to present with more advanced-stage disease.<sup>237</sup>

These health disparities in prostate cancer care and management are well-documented and exist in different stages of treatment.<sup>238</sup> For example, individuals from racial and ethnic populations are more likely to receive delayed treatment,<sup>239</sup> and Black men with high-risk or aggressive prostate cancer are often less likely to receive necessary surgery or radiation.<sup>240</sup> According to a paper published by the American Society of Clinical Oncology in 2022, the results of a 2019 study involving 300,000 patients with prostate cancer from different racial backgrounds suggest that when patients have similar access to care and standardized treatment, Black patients with nonmetastatic prostate cancer appeared to have stage-for-stage prostate cancer-specific mortality comparable to that of white men.<sup>241</sup> The authors suggested that assessing the equitable use of healthcare resources “may serve as a strategic point of intervention to eliminate barriers to access to care.”<sup>242</sup>

Prompt diagnosis is a critical first step to treating prostate cancer. Prostate cancer often has no symptoms until the disease is advanced.<sup>243</sup> Some organizations that focus on prostate cancer patient support and treatment promote screening before symptoms emerge as a means to detect cancer early when the chances of treatment success are high.<sup>244</sup> Prostate cancer

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<sup>232</sup> Valentina A. Zavala et al., *Cancer Health Disparities in Racial/Ethnic Minorities in the United States*, 124 *British J. of Cancer* 315 (Sept. 9, 2020).

<sup>233</sup> Siegel et al., *supra* note 199.

<sup>234</sup> Zavala et al., *supra* note 232.

<sup>235</sup> *Id.*

<sup>236</sup> *Id.*

<sup>237</sup> *Id.*

<sup>238</sup> Cyrus Washington MD et al., *Health Disparities in Prostate Cancer and Approaches to Advance Equitable Care*, American Society of Clinical Oncology Educational (June 7, 2022), [https://ascopubs.org/doi/pdf/10.1200/EDBK\\_350751?role=tab](https://ascopubs.org/doi/pdf/10.1200/EDBK_350751?role=tab).

<sup>239</sup> Zavala et al., *supra* note 232.

<sup>240</sup> *Id.*

<sup>241</sup> Washington et al., *supra* note 238 (citing and discussing the results of Robert T. Dess et al., *Association of Black Race with Prostate Cancer-Specific and Other-Cause Mortality*, *JAMA Oncology* (May 23, 2019), <https://jamanetwork.com/journals/jamaoncology/fullarticle/2734259>).

<sup>242</sup> Washington et al., *supra* note 238.

<sup>243</sup> Prostate Cancer Foundation, *Screening and Early Detection*, <https://www.pcf.org/about-prostate-cancer/diagnosis-staging-prostate-cancer/screening-early-detection/> (last visited Mar. 11, 2024).

<sup>244</sup> *Id.*

health outcomes are worse for Black men, in part because they are less likely to be screened or to receive treatment for prostate cancer.<sup>245</sup> A study evaluating attitudes toward prostate cancer care from 2015 to 2017 reported that Black men expressed fear that prostate cancer screening would not be thorough and personal test results would be misused, resulting in higher degrees of negative opinion and fear of diagnostic outcomes.<sup>246</sup> Similarly, a paper published by the American Cancer Society in 2022 concluded that symptomatic Black men were less likely to seek professional evaluation and advice on prostate cancer and noted that lack of access to clinicians with similar cultural backgrounds may be one of the factors leading to mistrust.<sup>247</sup> Both the American Cancer Society paper and a Collective member organization that spoke with the assessment team observed that Black men found it important to have a clinician with a similar cultural background.<sup>248</sup> In 2018, only 5% of all active clinicians were Black.<sup>249</sup> Improving racial, ethnic, and cultural diversity within the healthcare system and developing partnerships with community organizations may improve communication and trust, resulting in better outcomes for Black men with prostate cancer.<sup>250</sup>

Pfizer established an initiative aimed at increasing the number of cancer screenings and follow-up appointments.<sup>251</sup> Pfizer's website notes that cancer screenings and checkups, such as mammograms and prostate-specific antigen ("PSA") blood tests, have decreased significantly in the United States since the start of COVID-19 because of delays or cancellations.<sup>252</sup> Pfizer's Living With Cancer platform, as described above, houses the "Get It Done" initiative, which offers tools and resources to guide patients in conversations with their doctor and prepare them for their appointments, either in person or via telehealth.<sup>253</sup> Each

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<sup>245</sup> James W. Lillard et al., *Racial Disparities in Black Men with Prostate Cancer: A Literature Review*, 128 *Am. Cancer Society J.* 3747 (Nov. 2022), <https://acsjournals.onlinelibrary.wiley.com/doi/10.1002/cncr.34433>.

<sup>246</sup> Charles R. Rogers PhD, MPH, MS et al., *Attitudes Towards Genomic Testing and Prostate Cancer Research Among Black Men*, 55 *Am. J. of Preventive Medicine* S103 (Nov. 2018), <https://www.sciencedirect.com/science/article/pii/S0749379718319445?pes=vor>; see also Lillard et al., *supra* note 245 (discussing results of the study).

<sup>247</sup> Lillard et al., *supra* note 245 (citing Marcella Alsan et al., *Does Diversity Matter for Health? Experimental Evidence from Oakland* (National Bureau of Economic Research, Working Paper No. 24787, 2018), <https://www.nber.org/papers/w24787>).

<sup>248</sup> Lillard et al., *supra* note 245 (citing Santino S. Butler et al., *Racial Disparities in Patient-Reported Measures of Physician Cultural Competency Among Cancer Survivors in the United States*, 6 *JAMA Oncology* 152 (2020), <https://jamanetwork.com/journals/jamaoncology/fullarticle/2753554>).

<sup>249</sup> Lillard et al., *supra* note 245; Association of American Medical Colleges, *Diversity in Medicine: Facts and Figures 2019*, <https://www.aamc.org/data-reports/workforce/interactive-data/figure-18-percentage-all-active-physicians-race/ethnicity-2018> (last visited Mar. 11, 2024).

<sup>250</sup> Lillard et al., *supra* note 245.

<sup>251</sup> This is Living With Cancer, *Get It Done: Cancer Screenings and Follow-Ups Can't Wait*, <https://www.thisislivingwithcancer.com/content/get-it-done> (last visited Mar. 11, 2024).

<sup>252</sup> *Id.*; see also Ashley Cairns MD et al., *Impact of the COVID-19 Pandemic on Breast Cancer Screening and Operative Treatment*, 88 *SAGE* 1051 (June 2022) (concluding that the COVID-19 pandemic led to a decrease in screening and diagnostic mammograms); Seyed Mostafa Mostafavi Zadeh et al., *COVID-19 Pandemic Impact on Screening and Diagnosis of Prostate Cancer: A Systematic Review*, *BMJ Journal* (Sept. 25, 2023), <https://spcare.bmj.com/content/early/2023/09/25/spcare-2023-004310> (concluding that the COVID-19 pandemic led to a decrease in PSA blood tests).

<sup>253</sup> Get It Done, *supra* note 251.



guide provides questions for patients to ask their medical care providers or tips to have a better understanding of expectations for the appointment.<sup>254</sup> In addition, Pfizer partnered with the Urology Care Foundation in 2021 and 2022 to generate a checklist for African American and Latino men to help them understand which checkups and screenings they should receive and when they should receive them.<sup>255</sup> To enable greater early detection of prostate cancer, the checklist recommends that African American men speak to their doctors about PSA testing starting at age 45.<sup>256</sup> The checklist recommends that Latino men discuss the same testing with their doctors as early as age 40 for those at higher risk due to family history, or age 55 for those at average risk.<sup>257</sup>

In addition to Pfizer’s advocacy for prostate cancer screening, the company partners with external organizations to educate the healthcare community on how to reduce prostate cancer treatment disparities. For example:

- In collaboration with the Advanced Prostate Cancer Steering Committee—a group of oncology subject matter experts from academia and the private sector—Pfizer produced a resource guide to educate nurse and patient navigators on how to help advanced prostate cancer (“APC”) patients manage healthcare challenges and reduce barriers to care.<sup>258</sup> The resource guide describes the racial and ethnic healthcare disparities for APC patients, and provides tools on ways navigators can promote equitable treatment for racially and ethnically diverse patients.<sup>259</sup>
- In 2022, Pfizer worked with the American Urological Association (“AUA”)—a professional membership association that aims to promote the highest standards of urological clinical care<sup>260</sup>—to assess current prostate cancer healthcare practices and generate

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<sup>254</sup> This is Living With Cancer, *In-Person Appointment Guide: 5 Questions & Tips to Help Prepare* (Nov. 2020), [https://www.thisislivingwithcancer.com/sites/default/files/tlwc\\_in-person\\_appointment\\_guide.pdf](https://www.thisislivingwithcancer.com/sites/default/files/tlwc_in-person_appointment_guide.pdf); This is Living with Cancer, *Telehealth Appointment Guide: 8 Tips to Help Prepare* (Nov. 2020), [https://www.thisislivingwithcancer.com/sites/default/files/tlwc\\_telehealth\\_appointment\\_guide.pdf](https://www.thisislivingwithcancer.com/sites/default/files/tlwc_telehealth_appointment_guide.pdf).

<sup>255</sup> Urology Care Foundation & Pfizer, *Men’s Checklist: What African American Men Should Know* (Mar. 2021), <https://www.urologyhealth.org/educational-resources/mens-checklist-what-african-american-men-should-know>; Urology Care Foundation & Pfizer, *Men’s Checklist: What Latino Men Should Know* (May 2022), <https://www.urologyhealth.org/educational-resources/mens-checklist-what-latino-men-should-know-fact-sheet>.

<sup>256</sup> Men’s Checklist: What African American Men Should Know, *supra* note 255.

<sup>257</sup> Men’s Checklist: What Latino Men Should Know, *supra* note 255.

<sup>258</sup> Pfizer, *Navigating Advanced Prostate Cancer: A Resource Guide for the Navigator* (Aug. 2021), <https://www.patientnavigation.com/prostate-cancer>.

<sup>259</sup> *Id.* at 8–10. For example, the guide describes how to provide culturally competent care, including by developing a working knowledge and understanding of the patient’s background and beliefs, asking for a patient’s language preference, and arranging for interpreter services when needed. *Id.* at 60.

<sup>260</sup> American Urological Association, *About the AUA*, <https://www.auanet.org/about-us/aua-overview> (last visited Mar. 11, 2024).

recommendations to address healthcare disparities and improve care.<sup>261</sup> Pfizer and AUA surveyed AUA members on barriers to care for APC patients,<sup>262</sup> finding that nearly 60% of respondents had not received formal training on health disparities and 34% reported that they were not very aware of potential clinical trials for their APC patients.<sup>263</sup> After interviewing three physicians with expertise in addressing prostate cancer healthcare disparities, Pfizer and the AUA identified several steps that the urologic healthcare community could take to promote quality and equitable care, including: (i) engaging with underrepresented patients in a more casual and less intimidating environment, such as through community health forums; (ii) conducting outreach with other physicians—such as medical interns and primary care providers—to promote early prostate cancer screening; (iii) allocating funding for clinical trial staff positions that are dedicated to educating minority patients on the benefits of clinical trial participation; and (iv) helping patients identify and use available financial assistance opportunities.<sup>264</sup>

- Pfizer has provided monetary support to organizations providing advocacy, educational, and financial support for the prostate cancer patient community. For instance, the Foundation provided an Accelerating Health Equity grant to ZERO Prostate Cancer—a non-profit organization with a mission to end prostate cancer and to provide resources for those impacted by prostate cancer<sup>265</sup>—to support an initiative providing prostate cancer awareness and education services to Black men in North Carolina, South Carolina, and Georgia. In addition, in May 2023 Pfizer Oncology sponsored a prostate cancer town hall with Prostate Health Education Network (“PHEN”) as part of PHEN’s Prostate Cancer Disparity Rally for New York City, New Jersey, and Philadelphia.<sup>266</sup> The town hall brought together leaders from the church, government, industry, advocacy, and medical communities to discuss strategies for addressing the racial disparity amongst prostate cancer patients.<sup>267</sup>

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<sup>261</sup> Pfizer & American Urological Association, *Advancing Health Equity: Addressing Disparities in Prostate Cancer Care* (Sept. 2022), [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjw9rFhYOEAX7FlkFHYyhCkgQFnoECAsQAQ&url=https%3A%2F%2Fwww.auanet.org%2Fdocuments%2Fpractices-resources%2Fquality%2Fquality-improvement-library%2FPP.XDI.USA.0370Health%2520Equity-Addressing%2520Disparities%2520in%2520Prostate%2520Cancer.pdf&usg=AOvVawoiEmUT9oA3Uz2\\_Vplt6osC&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjw9rFhYOEAX7FlkFHYyhCkgQFnoECAsQAQ&url=https%3A%2F%2Fwww.auanet.org%2Fdocuments%2Fpractices-resources%2Fquality%2Fquality-improvement-library%2FPP.XDI.USA.0370Health%2520Equity-Addressing%2520Disparities%2520in%2520Prostate%2520Cancer.pdf&usg=AOvVawoiEmUT9oA3Uz2_Vplt6osC&opi=89978449).

<sup>262</sup> *Id.* at 3.

<sup>263</sup> *Id.* at 5.

<sup>264</sup> *Id.* at 7, 15–19.

<sup>265</sup> ZERO Prostate Cancer, *Our Mission & Impact*, <https://zerocancer.org/our-mission-impact> (last visited Mar. 11, 2024).

<sup>266</sup> Prostate Health Education Network, *PHEN and Pfizer Partner for the Rally’s Town Hall Meeting on May 9th* (Apr. 19, 2023), <https://myemail.constantcontact.com/PHEN-and-Pfizer-Partner-for-the-Prostate-Cancer-Disparity-Rally-s-Town-Hall-Meeting.html?soid=1110588872340&aid=i6KEkTny1go>.

<sup>267</sup> *Id.*; Prostate Health Education Network, *The Rally’s Town Hall Meeting Hosted at Pfizer’s Headquarters Was Highly Successful*, <https://phentv.com/the-rallys-town-hall-meeting-hosted-at-pfizer-headquarters-was-highly-successful/> (last visited Mar. 11, 2024).

## Recommendations

- Consider creating additional opportunities for individuals working on health equity initiatives across the company to exchange ideas and information. For example, the Institute of Translational Equitable Medicine could provide a forum for quarterly meetings that bring together different parts of the organization to exchange information on ongoing health equity initiatives within Pfizer and partnerships with external organizations.
- Continue investing in efforts to track and study Pfizer's clinical trial data and expand Pfizer's use of clinical trial sites in locations with large populations of underrepresented communities. Consider expanding work with community-based organizations to develop outreach plans to connect with and support recruitment of a diverse group of patients. Plans should be designed to support recruitment of patients from underrepresented groups, such as providing clinical trial information in a wide variety of languages spoken in the United States, including in immigrant communities, to avoid omitting a set of participants based on their difficulty understanding the available materials.
- Consider opportunities to strengthen and expand Pfizer's support for organizations working to advance health equity, including by further engagement with Multicultural Health Equity Collective members and recipients of Accelerating Health Equity grants.
- Continue to evaluate opportunities to provide patients with affordable medicines and consider innovative approaches to support broader access to medicines.
- Consider expanding the use of temporary "growth gig" assignments as an opportunity to rotate personnel from different business units, including field positions, through assignments focused on DEI, including roles related to clinical trial diversity, the work of the Multicultural Health Equity Collective, or supplier diversity.

## VIII. Pillar 3: Transform Society Through External DEI Partnerships

The third pillar of Pfizer's DEI strategy centers on Pfizer's civic engagement and efforts to increase opportunities for underrepresented suppliers to compete for contracting opportunities with the company. Pillar 3 initiatives include (i) identifying and engaging underrepresented suppliers and managing existing supplier relationships, and (ii) encouraging employees to engage with their communities and support philanthropic causes important to them through the work of the Pfizer Foundation ("the Foundation"). Pfizer has also taken steps to promote financial inclusion through its work with certain minority-owned financial institutions. As described below, Pfizer has made progress regarding each of these objectives.

### A. Expanding Opportunities for Underrepresented Suppliers

In the early 2000s, Pfizer began working to provide business opportunities and opportunities for long-term relationships, mentorship, and development to suppliers from

underrepresented groups.<sup>268</sup> Pfizer has noted that, “by having a strong supplier diversity program, [Pfizer] create[s] an opportunity for individuals to participate in microeconomies, macroeconomies, and the global economy, all while [the company] support[s] the actual extension of wealth from the sphere that exists here to other spheres that have historically been disenfranchised.”<sup>269</sup> A 2022 report published by the National Minority Supplier Development Council similarly concluded that increasing spend with minority-owned suppliers had a positive multiplier effect, creating additional income for lower-tier suppliers, employees, and driving sales in the communities where employees live and work.<sup>270</sup> A 2022 McKinsey study concluded that doubling investments and spending with minority- and women-owned businesses could yield over \$280 billion in extra income and create millions of jobs.<sup>271</sup>

Pfizer’s supplier inclusion efforts aim to expand opportunities to a broad range of businesses, including those certified as a Minority Business Enterprise (“MBE”), Woman-owned Business Enterprise (“WBE”), Disabled-owned Business Enterprise, Service Disabled Veteran-Owned Business (“SDVBE”), Veteran Business Enterprise (“VBE”), Small Disadvantaged Business (“SDB”), HUB Zone Business (“HUB”), Lesbian, Gay, Bisexual, and Transgender Business Enterprise (“LGBTBE”), and U.S. Federal Government-categorized Small Businesses.<sup>272</sup> In 2020, Pfizer announced several aspirational goals related to advancing equity, including an aspirational goal of increasing the company’s spending with these business by 50% by the year 2025.<sup>273</sup> The company accomplished this goal in 2022, increasing its spending with these suppliers by more than \$200 million compared to 2021. Having accomplished the aspirational goal it set in 2020, Pfizer is continuing efforts to expand opportunities for underrepresented suppliers to do business with the company. While Pfizer expects its spending with these suppliers to continue increasing overall in the years to come, the company acknowledges that there are potential challenges to Pfizer’s ability to accomplish this objective in the near term, including an anticipated reduction in overall spending in 2024. Pfizer recognizes these potential obstacles and is working to develop strategies to overcome them. Notwithstanding variance in annual spending, Pfizer’s work to expand opportunities for underrepresented suppliers also includes efforts to help suppliers grow their businesses by pairing with larger companies, allowing for stewardship and support within Pfizer’s supplier network.

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<sup>268</sup> Jordan Reed, *Pfizer’s Commitment to Supplier Diversity*, [https://www.pfizer.com/news/articles/pfizer\\_s\\_commitment\\_to\\_supplier\\_diversity](https://www.pfizer.com/news/articles/pfizer_s_commitment_to_supplier_diversity) (last visited Mar. 11, 2024).

<sup>269</sup> *Id.*

<sup>270</sup> National Minority Supplier Development Council, *2022 Minority Business Economic Impact Report (2022)* at 8, <https://21414464.fs1.hubspotusercontent-na1.net/hubfs/21414464/NMSDC%20Minority%20Business%20Economic%20Forum/NMSDC%202022%20Minority%20Businesses%20Economic%20Impact%20Report%20-%20May%202023.pdf>.

<sup>271</sup> Milan Prilepok et al., *Expand Diversity Among Your Suppliers—And Add Value To Your Organization*, McKinsey & Company (May 17, 2022), <https://www.mckinsey.com/business-functions/operations/our-insights/expand-diversity-among-your-suppliers-and-add-value-to-your-organization>.

<sup>272</sup> Pfizer, *Supplier Diversity*, <https://www.pfizer.com/en/about/careers/supplier-diversity> (last visited Mar. 11, 2024); Pfizer, *About Supplier Diversity*, <https://www.pfizer.com/about/partners/B2B-and-suppliers/supplier-diversity> (last visited Mar. 11, 2024).

<sup>273</sup> Reed, *supra* note 268.

Pfizer's Supplier Diversity team, which sits within the company's sourcing organization, oversees the company's efforts to expand opportunities among underrepresented suppliers. The Supplier Diversity team also works with individual businesses to help grow their relationships with Pfizer. These efforts include providing guidance to suppliers to help them become better business partners to Pfizer; connecting suppliers with procurement teams within Pfizer; and working with purchasing teams within Pfizer to help them identify potential suppliers and evaluate their capabilities. The Supplier Diversity team also collects data about the businesses Pfizer works with, including spending with small businesses generally as well as spending with underrepresented suppliers. Pfizer publicly reports aggregated information on its diverse supplier spend.<sup>274</sup>

Pfizer also engages in networking and mentorship to support minority business partners.<sup>275</sup> The company participates in membership organizations and trade events that promote opportunities to connect buyers with underrepresented suppliers.<sup>276</sup> Part of Pfizer's approach also includes a formal mentoring program in which Pfizer, through relationships with third parties, adopts a mentee for a set period of time. Pfizer has also participated in external mentorship programs, in which Pfizer works with the mentee organization to establish business goals, meet with other subject matter experts, and provide specialized support for the mentee to meet their goals. Mentees have been awarded business in and outside of the Pfizer enterprise.

## **B. Promoting Financial Inclusion**

Pfizer has taken several steps to promote financial inclusion in recent years.<sup>277</sup> In 2023, for example, Pfizer included a number of Minority- and Women-Owned Business Enterprise ("MWBE") underwriters in the group of financial institutions that supported a \$31 billion bond underwriting to help finance Pfizer's acquisition of Seagen. At the time, this was the fourth largest bond offering in U.S. history.<sup>278</sup> Consistent with its broader approach to the company's Pillar 3 objectives, Pfizer anticipated that participating in this transaction would facilitate the continued growth of these firms and enable them to leverage their participation in the Seagen transaction to compete for other large bond offerings.

In addition, Pfizer has taken steps to support MWBE investment managers. Pfizer recently participated in a funding round for Wellington Access Ventures—known as WAV—

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<sup>274</sup> Supplier Diversity, *supra* note 272.

<sup>275</sup> Reed, *supra* note 268.

<sup>276</sup> Mike Julianelle, *Aiming for Equity: Assessing Pfizer's Ongoing Commitment to Diversity and Inclusion*, [https://www.pfizer.com/news/articles/aiming\\_for\\_equity\\_assessing\\_pfizer\\_s\\_ongoing\\_commitment\\_to\\_diversity\\_and\\_inclusion](https://www.pfizer.com/news/articles/aiming_for_equity_assessing_pfizer_s_ongoing_commitment_to_diversity_and_inclusion) (last visited Mar. 11, 2024).

<sup>277</sup> Although these efforts were not included in Pillar 3 when it was developed, Covington learned about them during the assessment.

<sup>278</sup> Brian W. Smith & Josyana Joshua, *Pfizer Sells \$31 Billion of Bonds in Fourth-Largest Deal Ever*, Bloomberg (May 16, 2023), <https://www.bloomberg.com/news/articles/2023-05-16/pfizer-kicks-off-jumbo-bond-deal-to-help-fund-seagen-purchase?embedded-checkout=true>.



which is an investment management firm that aims to promote inclusion of underrepresented founders.<sup>279</sup>

### C. Philanthropy and Volunteerism

Pfizer's Pillar 3 commitment also includes the Foundation's Give *Forward* program, which encourages employees to donate money, volunteer hours, and provide expertise to charitable organizations. Give *Forward* encourages Pfizer employees to "identify, connect with, and amplify" their own individual impact to support "causes they find most meaningful" and provides support through online tools, programming, and incentives.<sup>280</sup> The Give *Forward* program is organized into three categories: (i) Give Time; (ii) Give Money; and (iii) Give Expertise.<sup>281</sup>

**Give Time.** The Foundation encourages employees in the United States to volunteer their own time, as individuals or in teams, with eligible 501(c)(3) tax-exempt organizations of their choosing.<sup>282</sup> Through the Community Volunteer Rewards Program, the Pfizer Foundation matches volunteer service at \$20 per hour up to \$1,000 in matching rewards per Pfizer employee per year for hours volunteered with eligible organizations. The \$20 "rewards" can then be given to other organizations, not just the organization the employee volunteered their time with. In 2023, over 5,000 employees collectively volunteered over 60,000 hours as part of this program.

**Give Money.** The Foundation also matches donations by regular full- and part-time U.S. and Puerto Rico-based employees to eligible 501(c)(3) tax-exempt organizations up to \$5,000 per year per employee.<sup>283</sup> In addition to the donation-matching program, the Foundation will often respond to humanitarian disasters by identifying organizations for which it will provide a dollar-for-dollar match for all global employee contributions.<sup>284</sup> The company also has periodic campaigns and events over the course of the year to encourage philanthropic giving. For example, the Colleague Engagement Team reached out to the Global Back Community ECRG in February 2023 to seek recommendations for organizations to highlight for employee giving. These periodic campaigns are subject to the \$5,000 annual maximum match. In 2023, employees generated over \$18.7 million dollars in donations through the Give *Forward* initiative.

**Give Expertise.** This initiative allows Pfizer employees to share their skills and expertise, in-person or virtually, with nonprofit organizations that help advance health and wellbeing in underserved communities.<sup>285</sup> For example, the Global Health Fellows program places Pfizer employees on skills-sharing assignments with key partner organizations to help

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<sup>279</sup> Alex Konrad, *Wellington Access Ventures Raises \$150 Million To Back Underrepresented Founders*, *Forbes* (Oct. 23, 2023), <https://www.forbes.com/sites/alexkonrad/2023/10/23/wellington-access-ventures-raises-150-million-to-back-underrepresented-founders/?sh=1cad12ce292a>.

<sup>280</sup> The Pfizer Foundation, *supra* note 150.

<sup>281</sup> Pfizer, *Give Forward*, <https://www.pfizer.com/about/responsibility/global-impact/give-forward> (last visited Mar. 11, 2024).

<sup>282</sup> *Id.*

<sup>283</sup> *Id.*

<sup>284</sup> *Id.*

<sup>285</sup> *Id.*

strengthen and support local health systems.<sup>286</sup> While this program primarily has a global focus, Global Health Fellows has begun offering support to The Foundation's Accelerating Health Equity Grant recipients. In 2023, over 11,000 employees in the United States and Puerto Rico participated in one or more Give *Forward* opportunities. In 2023, employees collectively helped over 9,700 causes.

## Recommendations

- Consider setting supplier diversity sub-goals for spend with Minority Business Enterprises, in addition to the overall goals around spend with diverse suppliers.
- Engage business leaders to set objectives for supplier spending, including with diverse suppliers, for each business or functional unit based on historical trends, current results, upcoming business plans, new contract availability, and feedback for what is needed to win specific upcoming contracts.
- Continue to invest in technological solutions to enhance the collection and analysis of diverse supplier engagement to promote equitable spending. Once technology is in place, consider establishing clear metrics for objectives and interim benchmarks to assess progress against the goals of the Supplier Diversity Program.
- Continue to work with ECRGs to identify volunteer opportunities for grantees to expand Pfizer's positive impact on charitable organizations that impact minority communities.

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<sup>286</sup> Pfizer, *Global Health Fellows and Teams*, <https://www.pfizer.com/about/responsibility/global-impact/global-health-fellows> (last visited Mar. 11, 2024).