Pfizer’s Human Rights Policy Statement

At Pfizer, we apply science and our global resources to further our purpose: breakthroughs that change patients’ lives. As one of the world's premier innovative biopharmaceutical companies, we strive to set the standard for quality, integrity, safety, and value in the discovery, development, and manufacture of health care products, including innovative medicines and vaccines. We collaborate with health care providers, governments, and local communities to support and expand access to reliable, affordable health care around the world, consistent with our core value of equity. For more than 170 years, we have worked to make a difference for all who rely on us.

1. Our Commitment

Pfizer is committed to conducting business in an ethical and responsible manner. This includes respecting internationally recognized human rights throughout our operations. Human rights are fundamental rights and freedoms that all people are entitled to, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These rights are enshrined in the International Bill of Human Rights1 and other international treaties and instruments, including the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. Pfizer is also committed to acting in line with the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Pfizer is proud to have been one of the early signatories to the United Nations (UN) Global Compact, an initiative that calls on companies to align strategies and operations with universal principles on human rights, labor, environment, and anti-corruption, and to take actions that advance societal goals. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts in our global operations, and remediate any adverse human rights impacts we may cause or contribute to. Wherever we can, we also seek to advance human rights.

Our approach to human rights risks is informed by international standards, industry best practice, and expert assessment. Laws and standards can vary significantly across the 100+ countries where we operate. In cases where local standards are less stringent than international human rights standards, Pfizer seeks to apply the international standard. In cases where local laws conflict with international human rights standards, Pfizer will comply with applicable laws while seeking ways to respect international human rights to the greatest extent possible.

2. Our Impact

In line with the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, Pfizer’s human rights approach focuses on addressing risks that could have the most severe impact on people: our patients, our colleagues, the workers of our business partners, and the communities in which we operate. Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local and global third-party vendors.

As a biopharmaceutical company, the right to health is of paramount importance. Other salient human rights are the principle of non-discrimination; the right to privacy; freedom from slavery and forced labor; the right to enjoy just and favorable conditions of work; the right to a safe workplace; and the right to a clean, healthy, and sustainable environment. Our overarching approach to each of these salient rights is described below.

---

1 The International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols.
2.1 Right to Health

The World Health Organization defines the right to health as: “The right of every human being to the enjoyment of the highest attainable standard of physical and mental health.”

Although governments have the primary duty for protecting, fulfilling, and respecting their peoples’ right to health, all stakeholders, including pharmaceutical companies, play a role.

Pfizer’s commitment to the right to health is reflected in our purpose: breakthroughs that change patients’ lives. We are proud of the contribution our science has made to the health of millions of people worldwide.

We know that health equity is only achieved when breakthroughs are made accessible to all. To enact our commitment to respect the right to health, we have created a tailored framework to systematically address this right across our portfolio and the many markets where we operate. Our core focus areas underpinning the right to health are: Access & Affordability, Intellectual Property Protection, Clinical Trials, and Disease Awareness and Health Literacy.

Access & Affordability

We seek to price our medicines in a way that balances patients’/payers’ ability to pay with the value that these innovations bring to patients and society, as well as our ability to continue to innovate and invest in the medicines and vaccines of the future. This includes working with payers to explore new business models such as linking reimbursement to the performance of our medicines. We also employ patient assistance programs, differentiated pricing, and, in certain circumstances, donations to help the most vulnerable patients access the medicines they need.

We periodically re-evaluate access initiatives as part of an effort to reach more patients over time. This includes engaging through strategic partnerships with the aim of strengthening health systems, improving access for underserved patients, and supporting the communities in which we live and work. For example, in 2022, Pfizer launched the Accord for a Healthier World, a first-of-its-kind initiative to enable sustained, equitable access to high-quality, safe, and effective medicines and vaccines with the potential to improve the health of 1.2 billion people living in 45 lower-income countries around the world. Through the Accord, we have committed to provide access to Pfizer’s full portfolio of medicines and vaccines for which Pfizer holds global rights – around 500 patented and off-patent products – on a not-for-profit basis to these countries.

Intellectual Property Protection

Intellectual property protections support the right to health by encouraging investment in medical innovation and by creating a framework that enables collaboration and partnerships. New treatments and vaccines, as well as improvements to existing medicines, exist because advancements in science are incentivized, valued, and protected by way of intellectual property rights. We see patient and societal benefit as the guiding principles in our IP

---

3 https://www.pfizer.com/about/programs-policies/prescription-value-and-pricing
4 During the COVID-19 pandemic we actively worked with governments and health partners to work towards fair and equitable access to vaccines and medicines, while also providing our expertise and resources for novel approaches that helped to strengthen healthcare systems where greater support has been needed. Further information about our efforts to help ensure equitable global access to COVID-19 vaccines & treatments can be found here (page 15): https://www.pfizer.com/sites/default/files/investors/financial_reports/annual_reports/2021/files/Pfizer_ESG_Report.pdf.
5 More information at: https://www.pfizer.com/about/responsibility/global-impact/accord
practice, as reflected in the IP PACT (Intellectual Property Principles for Advancing Cures and Therapies).6

Diversity in Clinical Trials

Pfizer is committed to advancing approaches to improve the diversity of clinical trials participants; thus, helping to improve outcomes for all patients and reducing healthcare disparities. Increasing diversity in clinical trials is a matter of equity. We are committed to designing clinical trials so that enrollment can reflect the racial and ethnic diversity of the countries where we conduct clinical trials and the epidemiology of the diseases we intend to treat or prevent. We are approaching the challenge of increasing diverse participation through a multipronged approach, including by working with members of multicultural communities and the establishment of a Clinical Trial Diversity Center of Excellence, focused on overcoming barriers and challenges to appropriate representation in clinical trials.7

Disease Awareness & Health Literacy

Empowering patients, communities, and healthcare professionals to make healthy choices supports the right to health. Pfizer dedicates significant resources to disease awareness and prevention campaigns, continuing education programs for healthcare professionals, and consumer health literacy projects.8

2.2 Other Salient Human Rights

Principle of Non-Discrimination

We strive for a workplace that is free from discrimination, harassment, or other forms of wrongful treatment. We believe that the workplace should reflect the diversity of the patients we serve and the communities in which we live. We make workplace decisions without regard to personal characteristics protected under applicable laws and Pfizer policy, including race, age, gender identification, sexual orientation, religion, or disability, among others. We do not tolerate discrimination, harassment, or retaliation of any kind. Our commitment to diversity is reflected in Pfizer’s Purpose Blueprint, which recognizes equity as one of four core values and behaviors that underpin everything we do.

Pfizer recognizes that the pursuit of equity remains a challenge for many communities. But every person deserves to be seen, heard, and cared for, and each one of us has a responsibility to raise our voices to make sure they are. Pfizer is committed to speaking out against discrimination, confronting conscious and unconscious bias, and leading courageous conversations with colleagues and with those in our communities so that we can make a meaningful impact and learn where we can. We regularly update our website with examples of how Pfizer is promoting diversity in our business and in our communities.9

---

6 Further information on Pfizer’s position on intellectual property can be found here: https://www.pfizer.com/about/responsibility/intellectual-property
7 Please refer to our website for further information on the ethical, scientific, and clinical standards that guide our clinical trials https://www.pfizer.com/science/clinical-trials/integrity-and-transparency
8 These initiatives are conducted responsibly, ethically, and transparently, and adhere to all applicable laws, regulations, and industry standards. Further information on Pfizer’s global policy on ethical business practices can be found here: https://www.pfizer.com/about/responsibility/compliance
9 Further information on Pfizer’s commitment to diversity can be found in our Annual Reviews: https://investors.pfizer.com/Investors/Financials/Annual-Reports/default.aspx, and here: https://www.pfizer.com/about/responsibility/diversity-and-inclusion
One example in practice is the Multicultural Health Equity Collective (MHEC), a Pfizer initiative focused on helping improve health equity across ethnic groups and other underrepresented communities facing significant health disparities within the United States.¹⁰

Right to Privacy

Pfizer handles large volumes of personal data, including information on patients, clinical trial participants, healthcare professionals, employees, and other business partners. We understand that unauthorized disclosure of sensitive personal data, particularly health data, could cause harm to an individual. It may lead to stigma, embarrassment, and discrimination. Pfizer believes that privacy is a fundamental right. When you entrust us with your personal data, you can expect that we will act ethically and responsibly. In fact, we have established privacy principles designed to ensure that personal data is used appropriately and protected.¹¹

Pfizer also commits to respect human rights in its use of emerging technology to accelerate health breakthroughs, such as artificial intelligence (AI). For example, our Pfizer Responsible AI Principles guide our approach. We have the obligation to use AI in a way that responsibly impacts our patients, customers, colleagues, and society. Our Responsible AI approach helps to mitigate key risks related to AI and instill trust in the information we provide and decisions we make with the help of AI. We seek to ensure that we are using AI responsibly by using safeguards such as a proprietary tool to review and mitigate bias from data and conducting trainings with internal staff on the ethical use of AI.

Freedom from Slavery and Forced Labor

Pfizer prohibits the use of all forms of forced, bonded, indentured, or compulsory labor (hereinafter, ‘modern slavery’) in our supply chain and business operations.¹³ We recognize that the risks of modern slavery are particularly likely where our business partners rely upon migrant workers and other workers who are particularly vulnerable to exploitation. We conduct due diligence to assess and address risks of modern slavery in our own operations and in our supply chain. In 2021, Pfizer rolled out a global corporate labor and human rights standard for our supplier base with a focus on modern slavery. The standard includes requirements for mitigating potential risk of harm to people arising from violation of human rights and labor standards. Pfizer also continues to have an active modern slavery working group, consisting of members from various functions including legal, procurement, Global Health & Social Impact, and Global Environment, Health and Safety. This working group is responsible for implementing the actions set out in Pfizer’s California and UK Modern Slavery Statement, developing further actions, and monitoring Pfizer’s modern slavery commitments. Further information can be found in Pfizer’s California and UK Modern Slavery Statement.¹⁴

¹⁰ The MHEC team works in partnership with key groups across the US – including patient advocacy organizations, healthcare provider associations, community groups, and legislative caucuses. This work is guided by the Pfizer Multicultural Advisory Council (PMAC), a dynamic group of leaders from various organizations that have helped enhance Pfizer’s level of cultural competency in reaching underrepresented communities. For further information, please refer to our website: https://www.pfizer.com/about/responsibility/global-impact/multicultural-health-equity-collective
¹¹ Pfizer’s privacy principles can be accessed here: https://www.pfizer.com/about/programs-policies/privacy-principles
¹³ Pfizer complies with the California Transparency in Supply Chains Act, the U.S. 48 C.F.R. § 52.222-50 Combating Trafficking in Persons, Section 54 of the U.K. Modern Slavery Act, the Australian Modern Slavery Act 2018, and other similar legislation.
¹⁴ Pfizer’s current California and UK Modern Slavery Statement is available here: https://www.pfizer.com/about/responsibility/human-rights
Right to Enjoy Just and Favorable Working Conditions

Each one of Pfizer’s thousands of employees around the world deserves to be treated with dignity and respect and has the right to just and favorable working conditions. Pfizer’s policies and practices reflect this conviction. We provide fair remuneration, benefits, and hours. Our performance management system also helps to support these values by measuring leaders not only on what they achieve but how they achieve it.¹⁵

Right to a Safe Workplace

Our long-standing commitment to protecting the health and safety of our colleagues and contractors in the workplace is outlined in Pfizer’s corporate environmental, health, and safety policy. This policy is supported by a range of global health and safety standards that detail the requirements to evaluate risks, implement controls, and comply with legal requirements to safeguard the health and safety of those involved in our operations.¹⁶

Right to a Clean, Healthy, and Sustainable Environment

We believe that all communities have the right to a clean, healthy, and sustainable environment, and we are committed to respecting this right. We recognize that climate change and other environmental issues can result in profound societal and public health impacts. Thus, maintaining a healthy environment and mitigating climate change are critical to supporting several human rights – e.g., the rights to a healthy environment, life, health, water and sanitation, and standard of living. We also consider where certain communities and groups may be more vulnerable to environmental impacts than others.

We are committed to maintaining compliance with laws related to the protection of the environment, health, and safety and we endeavor to communicate with neighboring communities in a manner that is transparent, authentic, and informative. We also implement our own standards and public corporate goals to further reduce potential environmental impact and mitigate climate change across our supply chain. For example, since establishing our first climate action goals in 2000, we have reduced our greenhouse gas (GHG) emissions by more than 60 percent and optimized other aspects of our environmental performance. Recognizing the urgency of challenges that climate change presents, in 2022 Pfizer committed to further reducing GHG emissions by aiming to achieve the voluntary Net-Zero Standard by 2040, ten years earlier than the timeline described in the standard.¹⁷

3. Expectations of our Supply Chain

Pfizer’s business objectives are enabled through an extensive supply chain, which includes raw material suppliers, manufacturers, logistics providers, contract research organizations, and other business partners. All members of our supply chain are expected to operate their businesses in a responsible and ethical manner, respecting human rights, as outlined in Pfizer’s Supplier Conduct Position Statement and Supplier Conduct Principles.¹⁸ We also work with our peers through organizations such as the Pharmaceutical Supply Chain Initiative to find new ways of tackling systemic issues in our shared supply chains. This includes encouraging our material suppliers to participate in capacity-building conferences and webinars.¹⁹

¹⁵ To learn more visit https://www.pfizer.com/about/careers
¹⁶ Further information on Pfizer’s approach to workplace safety can be found here: https://www.pfizer.com/purpose/workplace-responsibility
¹⁷ Further information on Pfizer’s commitment to environmental sustainability can be found here: https://www.pfizer.com/about/responsibility/environmental-sustainability. Pfizer’s Climate Change Position Statement can be found here: https://cdn.pfizer.com/pfizercom/about/Climate_Change_Position_Statement_December_2022.pdf
¹⁸ https://www.pfizer.com/about/partners/B2B-and-suppliers/responsible-sourcing
¹⁹ Further information on Pfizer’s commitment to protect the human rights of those in our supply chain can be found here: https://www.pfizer.com/about/partners/B2B-and-suppliers/responsible-sourcing
4. Reporting Concerns

In line with Pfizer’s Open-Door policy and our value of courage, colleagues can report human rights violations or concerns to any level of leadership within the company, human resources, legal, or compliance. The Compliance Helpline, operated by specially trained third-party representatives and available inside and outside the company, also provides a way to report concerns, anonymously in many locations, subject to local laws. All reports are handled promptly and confidentially. Retaliation against any employee who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited. Colleagues may also reach out to the Office of the Ombuds for information and guidance to help address and resolve work-related issues. Further information on Pfizer’s Open-Door policy can be found in our Code of Conduct.

5. Governance

The Governance & Sustainability Committee (G&SC) of the Board of Directors is primarily responsible for oversight of our Environmental, Social and Governance (ESG) strategy, reporting, policies and practices, which includes human rights topics. In addition, the Audit Committee of the Board, which has primary responsibility for overseeing Pfizer’s Enterprise Risk Management (ERM) program, reviews and receives briefings concerning risks to Pfizer associated with certain priority issues, including ESG areas.

Pfizer’s Executive Sustainability Committee is responsible for executive oversight of Pfizer’s ESG strategy and program, and Pfizer’s Sustainability Steering Committee, which is also a management committee, is responsible for oversight and accountability for Pfizer’s ESG strategy, priorities, performance, risk management and opportunities in line with Pfizer’s overarching corporate and business function strategies.

Pfizer’s Human Rights Policy Statement was developed by the Corporate Affairs Department with input from a cross-functional group of colleagues across the company and external stakeholders. Pfizer is committed to regularly reviewing this policy to ensure it remains in line with international best practice, as well as the evolving expectations of our patients, colleagues, and communities.

---

20 Local privacy laws may affect availability and terms of use of the Compliance Helpline. Certain jurisdictions limit the topics that may be reported, and whether anonymous reporting is available depends on location.
21 Colleagues are reminded that the Office of the Ombuds is not a formal reporting channel, and communications with the Office do not constitute official notice to the Company.