



## **Pfizer's Human Rights Policy Statement**

At Pfizer, trust is critical as 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 healthcare products, including innovative medicines and vaccines. We collaborate with healthcare providers, governments, and local communities to support and expand access to reliable, affordable healthcare around the world, consistent with our core value of equity. For over 175 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 Rights<sup>1</sup> 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 internationally recognized 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.

Our Code of Conduct (the Blue Book) establishes our commitment to ethical business practices as we operate and sets standards and expectations for how we do business, including our commitment to respecting human rights, taking responsible climate action, reducing our environmental impact, helping lessen healthcare disparities, and prioritizing

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<sup>1</sup> 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.

health, safety, diversity, inclusion, fairness, cooperation, and trust across our operations and supply chain. Our standards are designed to help ensure that our suppliers adhere to ethical labor practices and respect the rights of workers, in compliance with all applicable laws and regulations. We are committed to acting with integrity in everything we do, and our Values guide us in making the right decisions ethically, thoughtfully, and responsibly so that our business can appropriately meet patient and societal needs. Our leaders set the tone for our strong culture of integrity and encourage colleagues to raise concerns and speak up without fear of retaliation.

## **2. Governance**

Our focus on doing business responsibly includes our commitment to Human Rights, which is integrated into our governance approach for Responsible Business Growth (RBG), as reported on in our Impact Report.<sup>2</sup> Our strategy, governance, and risk management in this area is aligned to our enterprise strategy and overseen by our RBG Office and RBG governance committees. The head of our RBG Office also has responsibility inclusive of Human Rights. Through this integrated approach we advance ethical decision making, including in areas of human rights, into our business practices as we deliver for patients.

Our governance is built on the principles of oversight by our Board of Directors, commitment by and accountability of leadership, and colleague engagement across the company. Additionally, we leverage diverse perspectives from internal and external stakeholders to inform our responsible business strategy and priorities.

Our Sustainability Steering Committee, a management committee chaired by the head of our RBG Office, has responsibility for oversight and accountability for Pfizer's strategy, priorities, performance, risk management and opportunities related to responsible business growth, which includes human rights topics, with input from experienced subject matter experts and advisors. This Committee is overseen by the Executive Sustainability Committee, with escalation as appropriate to the Governance Committee of the Board of Directors, which is primarily responsible for oversight of our RBG strategy, reporting, policies, and practices.

Pfizer's Human Rights Policy Statement was developed 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.

## **3. 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

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<sup>2</sup> [Pfizer Impact: Responsible Business | Breakthroughs that change patients' lives | Pfizer](#)

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.

### **3.1 Right to Health**

We continue to focus on the right to health as our most salient human rights issue, with availability, accessibility, and affordability as key focus areas.

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.”<sup>3</sup> 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 achieved only 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.

#### **Access & Affordability**

At Pfizer, we measure ourselves not just by the creation of breakthrough medicines and vaccines, but by the availability and accessibility of those critical innovations among populations in need. Our vaccines and medicines cannot benefit patients if they cannot access or afford them. To change patients’ lives, Pfizer applies a modernized approach to access, focused on affordability and delivery for patients with the greatest coverage gaps and out-of-pocket exposure.

Affordability is a long-term commitment and is embedded in our systems, incentives, and operating model. Pfizer’s broad-based core methods to help reduce the number of people who cannot afford our medicines include:

- Advocating with payers, governments, and others in the healthcare system on behalf of patients to identify and relieve financial burdens.
- Patient assistance and donation programs when insurance or reimbursement systems are unable to provide affordable access to our medicines.
- Innovative financing mechanisms, including differential pricing, microfinancing, subscription models, and flexible payment options, to help reduce out-of-pocket costs for patients on a sustained basis.
- Exploration of approaches and technologies that may have the potential to reduce barriers to care.

We also engage in global commercial access partnerships with organizations like Gavi, the Vaccine Alliance. We participate in the process of the bi-annual Access to Medicine Index, which reflects our key access to medicine initiatives.

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<sup>3</sup> Constitution of the World Health Organization Principles, 1946.

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 commitment 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 on a not-for-profit basis to these countries.<sup>4</sup>

## Pricing

Our pricing principles and enterprise governance for pricing and access are designed to help ensure effective leadership oversight and alignment to our commitment to patients and equitable access.

We are committed to pricing our medicines in a way that reflects the benefit they bring to patients and society, helping ensure patients have access and enabling us to continue to invest in new medicines. 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.<sup>5</sup>

- We may consider a number of factors when determining a medicine's price, including, for example: its impact on patients and their disease, other available treatments, its potential to reduce other healthcare costs, such as hospital stays, and affordability.
- We may also consider our investments to maintain the quality, safety, and reliability of our medicines, and our ability to continue to innovate to bring new, life-changing medicines and vaccines to patients.

## Intellectual Property Protection

Intellectual property (IP) 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 practice, as reflected in the IP PACT (Intellectual Property Principles for Advancing Cures and Therapies).

When assessing whether an invention may be patentable, we evaluate whether the invention reflects a genuine innovation that will ultimately support the needs of patients. We recognize the unique level of economic development and social challenges of Least Developed Countries (LDCs), as defined by the United Nations Committee for

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<sup>4</sup> More information at: <https://www.pfizer.com/about/responsibility/global-impact/accord>

<sup>5</sup> <https://www.pfizer.com/about/programs-policies/prescription-value-and-pricing>

Development Policy; therefore, Pfizer has a policy of patent non-enforcement in LDCs.<sup>6</sup>

### **Clinical Trial Practices**

Every clinical trial is built on trust, and we are committed to protecting the people who take part in our clinical trials. We honor that trust by sharing our policies and ensuring clinical trials are planned, conducted, and reviewed to high scientific, ethical, and clinical standards. We are committed to clinical trial practices designed to ensure the rights, safety, and well-being of all clinical trial participants while maintaining high scientific quality, integrity, ethics, and adherence to laws and regulations.

Our work in clinical trials is fundamental to achieving our Purpose. Patient health and safety is at the heart of this — including how we design, run, and communicate our clinical trial research. Our leadership is committed to quality and ethical conduct in clinical trials, as is also reflected in our policies and processes. Our conduct is guided with the help and oversight of a variety of groups, including patient organizations, institutional review boards and ethics committees, regulatory authorities, data and safety monitoring boards, and medical and industry association guidelines governing ethical clinical trial conduct and research integrity.

All Pfizer-sponsored interventional studies respect study participant rights and patient privacy. Required training for both Pfizer employees and contracted research sites includes a focus on ethical topics. Studies are conducted in accordance with our high ethical standards, applicable laws and regulations, and principles derived from relevant international standards, including:

- The Council for International Organizations of Medical Sciences (CIOMS) International Ethical Guidelines
- The International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) E6 guideline for Good Clinical Practice
- PhRMA's Principles on Conduct of Clinical Trials and Communication of Clinical Trial Results
- The Declaration of Helsinki
- The U.S. Belmont Report.

### **Representation in Clinical Trials**

At Pfizer, we are committed to making our clinical trials more accessible and responsive to participant needs and preferences, and to ensuring that enrollment reflects the epidemiology of the disease we intend to treat or prevent. By raising awareness, increasing access, and addressing certain logistical considerations associated with clinical trial participation, we aim to ensure that as many people as possible have the opportunity to contribute to clinical research.

Pfizer has taken many steps over the years to help ensure broad access and representation in clinical trials, including reinforcing the importance of representation in trials among our

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<sup>6</sup> To learn more about our patent practices and commitment to access to medicines, please see [https://cdn.pfizer.com/pfizercom/Pfizer\\_Patent\\_Policy\\_Position\\_v2\\_01APRIL2025.pdf](https://cdn.pfizer.com/pfizercom/Pfizer_Patent_Policy_Position_v2_01APRIL2025.pdf)

clinical study teams. We have also shared our own knowledge and learnings with others because we recognize that no single entity can solve the long-standing challenges to ensuring broad access to clinical trials alone.

### **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.<sup>7</sup>

## **3.2 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. Equity is one of Pfizer's four core values and demonstrates Pfizer's commitment to our colleagues.

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.

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.<sup>8</sup>

### **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

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<sup>7</sup> 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>

<sup>8</sup> 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>

have established privacy principles designed to ensure that personal data is used appropriately and protected.<sup>9</sup>

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<sup>10</sup> guide our approach. We have the obligation to use AI responsibly, considering its impacts on 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, including child labor (hereinafter, ‘modern slavery’) in our supply chain and business operations.<sup>11</sup> We recognize that the risks of modern slavery may be higher 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 implemented a company labor and human rights standard setting the internal expectations for our assessment of modern slavery risk within our supplier chain. The standard includes requirements for mitigating potential risk of harm to people arising from violation of human rights and labor standards. Pfizer has a dedicated, cross-functional forum, the Human Rights Working Group, consisting of members from various functions including legal, risk management, procurement, and safety and environmental operations. This working group is responsible for driving a cohesive and systematic approach to human rights risk management, governance throughout Pfizer and Pfizer’s value chain, and implementing the actions set out in Pfizer’s Forced Labor, Child Labor, Human Rights and Decent Working Conditions Regulatory Disclosures (Modern Slavery Statement). Further information can be found in Pfizer’s Modern Slavery Statement.<sup>12</sup>

### **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.<sup>13</sup>

### **Right to a Safe Workplace**

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<sup>9</sup> Pfizer’s privacy principles can be accessed here: <https://www.pfizer.com/about/programs-policies/privacy-principles>

<sup>10</sup> [https://www.pfizer.com/news/articles/three\\_principles\\_of\\_responsibility\\_for\\_artificial\\_intelligence\\_ai\\_in\\_healthcare](https://www.pfizer.com/news/articles/three_principles_of_responsibility_for_artificial_intelligence_ai_in_healthcare)

<sup>11</sup> Pfizer complies with the California Transparency in Supply Chains Act, the U.S. 48 C.F.R. § 52.222-50 Combating Trafficking in Persons, the U.K. Modern Slavery Act, the Australian Commonwealth Modern Slavery Act, Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, the Norwegian Transparency Act, and the Swiss Code of Obligations Section 221.433 (the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor).

<sup>12</sup> Pfizer’s current Modern Slavery Statement is available here: <https://www.pfizer.com/about/responsibility/human-rights>

<sup>13</sup> To learn more visit <https://www.pfizer.com/about/careers>

Our long-standing commitment to protect the health and safety of our colleagues and contractors in the workplace and comply with applicable legal requirements is outlined in Pfizer's corporate environmental, health, and safety policy. This policy is supported by a range of company health and safety standards that detail the requirements to evaluate risks, implement controls, and support their effectiveness to help safeguard the health and safety of those involved in our operations.<sup>14</sup>

### **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, helping to maintain a healthy environment and mitigate 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. 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.<sup>15</sup>

### **4. 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. Our Third Party Risk Management processes for our supplier base are aimed at protecting and promoting Human Rights, ethics, compliance, and responsible supply chain practices. 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. We also work with our peers through organizations such as the Pharmaceutical Supply Chain Initiative (PSCI) to help tackle systemic issues in our shared supply chains.<sup>16</sup> This includes encouraging our material suppliers to participate in capacity-building conferences and webinars.

Responsible supply chain management is core to how we do business. We operate within a framework of principles aligned with ethical, social, and environmental responsibilities to help ensure sustainability of our business and the communities in which we operate. We work through organizations such as the PSCI to drive alignment.

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<sup>14</sup> Further information on Pfizer's approach to workplace safety can be found here: <https://www.pfizer.com/about/responsibility/health-safety>

<sup>15</sup> Further information on Pfizer's commitment to environmental sustainability, including Pfizer's Climate Change Position Statement, can be found here: <https://www.pfizer.com/about/responsibility/environmental-sustainability>.

<sup>16</sup> 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>

Pfizer aims to partner with external suppliers that are committed to operating their businesses in a responsible and ethical manner, respecting the rights of the individuals whom they employ, and helping protect the environment. Pfizer strongly encourages our supply partners to support our Supplier Conduct Principles or adopt their own codes which include expectations similar to ours, including (among others):

- Operate in compliance with all applicable laws, rules and regulations.
- Conduct their business in an ethical manner, acting with integrity.
- Commit to upholding the human rights of workers and treating them with dignity and respect.
- Provide a safe and healthy work environment, including any company-provided living quarters.

We set high standards for responsible supply chain management guided by robust governance processes. This helps ensure the safety and quality of the medicines and vaccines we produce and aligns with our core value of Equity. Compliance with laws is our baseline expectation, and we also establish other risk-based assessment criteria to help assure our suppliers are responsibly managing environmental, health, and safety (EHS) risks and maintaining a robust supply chain.

Our established risk-based evaluation of suppliers, including contract manufacturers, assesses EHS and sustainability performance. Evaluations include engagement with suppliers to help support their efforts to improve EHS, sustainability, and labor and human rights performance. To support the evaluation of human rights considerations, the reviews are aligned with SA 8000.<sup>17</sup> Pfizer maintains a focused human rights diligence program as described in our Modern Slavery Statement, which outlines our management approach in our supply chain and our operations.

## **5. Pfizer's channels and protections for individuals to raise questions, concerns, or issues relating to Human Rights**

In line with Pfizer's Code of Conduct, Open Door Policy, strict anti-retaliation policies, and our value of courage, colleagues are required to report misconduct or potential human rights violations, and are encouraged to raise questions, concerns or issues to any level of leadership within the company, human resources, legal, or compliance. Our annual Code of Conduct training reminds colleagues of the duty to report any concern they may have about behaviors or activities that may violate our policies or applicable law. Further, retaliation against any employee who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited.

Pfizer provides multiple channels for raising concerns, ideas, or questions. As detailed on Pfizer.com,<sup>18</sup> colleagues, suppliers, customers, and other third parties can contact Pfizer Compliance directly, or report a concern, get information, or get advice anonymously

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<sup>17</sup> SA8000 is an international certification standard that encourages organizations to develop, maintain and apply socially acceptable practices in the workplace.

<sup>18</sup> <https://www.pfizer.com/about/responsibility/compliance>

(where permitted by local law<sup>19</sup>) via Pfizer's publicly available Compliance Helpline. The Helpline is operated by specially trained third-party representatives (by phone or web in over 30 languages) and can be reached by phone or online, 24 hours a day, every day. All helpline reports are handled confidentially and promptly. Colleagues may also reach out to the Office of the Ombuds for information and guidance to help address and resolve work-related issues.<sup>20</sup>

Pfizer takes reports of known or suspected violations of company policies and applicable law seriously; our goal is to respond appropriately and promptly to all questions and reported concerns. We aim to identify and address any potential inappropriate conduct as early as possible, prevent future recurrences, and inform continuous improvement. Further information on Pfizer's Open-Door policy can be found in our Code of Conduct.<sup>21</sup>

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<sup>19</sup> EU Note: For more details on what information Pfizer collects and how it uses the information in the context of the Helpline, as well as for more information about your rights, please see the [Compliance Helpline Guidance & Privacy Notice](#). Furthermore, in certain EU countries, Pfizer also offers local reporting channels. For more information see <https://www.pfizer.com/about/responsibility/compliance>

<sup>20</sup> 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.

<sup>21</sup> <https://home.pfizer.com/sites/compliance/Pages/BlueBook.aspx>