

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

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Under Pfizer policy, bribery or corruption is defined as the provision of any payment or benefit to any person or entity in order to improperly influence the recipient or to gain an improper business advantage. Pfizer prohibits all forms of bribery or corrupt conduct, whether involving a government official or a private sector person or company and whether direct or through a third party acting on Pfizer's behalf ("Business Associates"). Bribery or engaging in corrupt conduct is never an acceptable business practice and, whether by its employees or Business Associates, will not be tolerated by Pfizer.

Pfizer will compete lawfully and ethically in the marketplace and expects every Pfizer employee and Business Associate to conduct all aspects of Pfizer business with integrity—including research, testing, registration, manufacturing, transportation, marketing and sales—regardless of the existence of any local customs or traditions that may call integrity into question.

## **No Pfizer Employee may ever:**

- Directly or indirectly offer or pay, or authorize an offer or payment, of money or anything of value to a government official, healthcare professional, or any other person or entity (including in the private sector), which is:
  - Intended to influence corruptly the judgment of the recipient in exercising his or her job responsibilities, or
  - Intended to corruptly secure preferential treatment or an improper advantage for Pfizer, or
  - Intended as gratitude for the recipient having made a decision or acted in a way that benefited Pfizer improperly.
- Directly or indirectly request or accept any money or item of value, which is:
  - Intended to influence corruptly the judgment or conduct of the Pfizer employee in his or her job responsibilities, or
  - Intended as gratitude for having made a decision or acted in a way that benefited improperly the person or entity giving the item of value to the Pfizer employee.

All Pfizer employees are expected to comply with applicable local laws related to anti-bribery and anti-corruption, as well as the anti-bribery and anti-corruption laws and regulations of the United States. If there is a real or apparent inconsistency or conflict between the requirements of U.S. law, local law, and Pfizer policies, Pfizer requires its employees to comply with the most restrictive standard.

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

## Interactions with Government Officials

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

It is Pfizer's policy to conduct its operations and activities in compliance with the U.S. Foreign Corrupt Practices Act of 1977 (the "FCPA"), as well as global anti-corruption laws, which generally prohibit making, promising, offering or authorizing the making of a payment or providing anything of value improperly to a government official in order to obtain or retain a business advantage.

Government official is broadly interpreted under the FCPA and other global anti-corruption laws, and for purposes of Pfizer's international anti-corruption policies and procedures, the definition of "Government Official" covers:

- (i) any elected or appointed non-U.S. Government official (e.g., a legislator or a member of a non-U.S. Government ministry),
- (ii) any employee or individual acting for or on behalf of a non-U.S. Government official, non-U.S. Government agency, or enterprise performing a function of, or owned or controlled by, a non-U.S. Government (e.g., a healthcare professional employed by a non-U.S. Government hospital or researcher employed by a non-U.S. Government university),
- (iii) any non-U.S. political party officer, candidate for non-U.S. public office, or employee or individual acting for or on behalf of a non-U.S. political party or candidate for public office,
- (iv) any employee or individual acting for or on behalf of a public international organization,
- (v) any member of a royal family or member of a non-U.S. military, and
- (vi) any individual otherwise categorized as a Government Official under applicable local laws or Pfizer policies.

This means that healthcare professionals who are employed by, teach at, or have privileges at a non-U.S. government hospital or public university are Government Officials under Pfizer's policy—even if they only work there part-time. In many countries outside of the U.S., particularly those in which the government owns or controls many healthcare providers and pharmacies, virtually all healthcare professionals may be considered Government Officials.

## Commercial (or Private Sector) Interactions

Under Pfizer policy, commercial (or private sector) bribery covers attempts to intentionally influence another party's actions in order to secure an improper advantage from their employer's or principal's commercial conduct. This can be done by granting, or agreeing to grant, a benefit to another party without the knowledge of that party's employer or principal.

Examples of commercial bribery include:

- Giving money or gifts to an employee of a private customer without knowledge of his/her employer in hopes that the employee will influence the customer to purchase Pfizer products;
- Providing a concealed incentive or “commission” to an employee of a private customer to improperly influence their actions; and
- Accepting or giving inappropriate gifts or hospitality, kickbacks, or investment opportunities to private individuals or entities doing or seeking to do business with Pfizer.

Under Pfizer’s anti-bribery and anti-corruption policy, Pfizer’s employees and Business Associates must never engage in commercial bribery.

## Facilitation Payments, Solicitation, and Extortion

Under Pfizer policy, a facilitation payment means a nominal, unofficial payment to a Government Official for the purpose of securing or expediting the performance of a routine, non-discretionary governmental action. Such payments are illegal in most countries and Pfizer is committed to eliminating such payments from its business. Pfizer prohibits any Pfizer employee or Business Associate from offering or authorizing the offer of a facilitation payment (directly or indirectly). All requests or demands for facilitation payments or bribes must be reported to a member of Pfizer’s Legal Division and in accordance with the reporting obligations set forth in the Reporting Violations section below.

Under Pfizer policy, when a payment is extorted by an imminent threat to the health, safety or welfare of a Pfizer employee, the demanded payment may be made. However, once the immediacy of the situation has been resolved, the payment must be reported to a member of Pfizer’s Legal Division, including information on the circumstances and amount of the payment. Any such payment always must be accurately and completely recorded in Pfizer’s books and records.

## Books and Records and Internal Controls

It is Pfizer’s policy to keep books and records that accurately and fairly reflect Pfizer’s transactions in reasonable detail and maintain internal controls to prevent and detect potential violations of Pfizer’s policies or of applicable laws. No false or artificial entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately. Pfizer also expects that any records provided by Business Associates to Pfizer will be accurate and include reasonable detail.

## Compliance with this Policy

Any violation of Pfizer’s anti-bribery and anti-corruption policy or related procedures by a Pfizer employee may have significant consequences for the employee and Pfizer, including potential prosecution, fines and other penalties for improper conduct, as well as imprisonment and/or disciplinary action up to and including termination for employees, consistent with local laws.



Violations by Business Associates may result in termination of the business relationship with Pfizer, among other potential consequences.

## Reporting Violations

Pfizer employees and Business Associates who know of, or reasonably believe there is, or imminently will be, a violation of Pfizer's anti-corruption policies and procedures, must report that information immediately as provided in Pfizer's Code of Conduct (Blue Book), *Pfizer's International Anti-Bribery and Anti-Corruption Business Principles*, as applicable, or otherwise to the Compliance Division.

Any transaction or interaction that is, or could be construed as, a corrupt or improper payment given to, or requested or accepted from, another person is a "Referable Compliance Issue" and must be reported immediately to the Compliance Division. Local privacy laws may affect availability and terms of use of reporting channels, such as the Pfizer Compliance Helpline.

Pfizer employees will be protected from retaliation for reporting concerns in good faith. Pfizer does not tolerate any act of retaliation against Pfizer employees who report potential or actual violations of Pfizer's policies or of applicable law in good faith.

### How to Report:

Pfizer provides many different avenues for its employees to report concerns, including reporting to supervisors and to Human Resources.

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

Email: [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com)  
Phone: 1-212-733-3026  
Secure fax: 1-917-464-7736

Mailing Address or in person at:  
235 East 42nd Street (235/12/1)  
New York, NY 10017 USA

In addition, compliance issues can be reported anonymously through the Pfizer Compliance Helpline at 866-866-PFIZ (or 7349) in the United States, and web reporting available at <https://pfizer.alertline.com>, subject to local privacy laws.

The *Summary of Pfizer's Anti-Bribery and Anti-Corruption Policy* is a general reference guide, and it does not describe all applicable law or Company policies or procedures, or give full details on any individual law, policy or procedure. Pfizer reserves the right to modify, revise, or alter any policy, procedure, or condition related to employment at its sole discretion. This *Summary of Pfizer's Anti-Bribery and Anti-Corruption Policy* is not a contract or legal document and is intended for informational use only. The information herein can be changed or revoked unilaterally by the Company at any time, and is not all-inclusive. If you have questions about this document, please contact the Compliance Division using the contact information above.