



2025

BLUE BOOK

Pfizer's Code of Conduct



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Pfizer's Code of Conduct (the Blue Book) is a general reference for all colleagues everywhere we do business. The Blue Book is not a legal document and is intended for informational use only. It does not describe all applicable laws or Company policies or give full details on any individual law or policy. Pfizer reserves the right to modify, revise, or alter any policy, procedure, or condition related to employment at its sole discretion and at any time without notice and without revision of the Blue Book. The contents of the Blue Book do not constitute the terms of a contract of employment, and nothing contained herein should be construed as a guarantee of continued employment or employment for any particular period of time—employment at Pfizer is on an at-will basis (subject to applicable laws). The information herein can be changed or revoked unilaterally by the Company at any time and is not all-inclusive. This online version of the Blue Book, accessible through the Compliance website (integrity.pfizer.com), supersedes all prior versions of the Blue Book.



Message From Our CEO

At Pfizer, we are focused on our purpose: *Breakthroughs that change patients' lives*. We are dedicated to creating a healthier world where every patient has the cure, the treatment, the vaccine they need.

Our success in delivering breakthroughs hinges on our commitment to our four core Values—**Courage, Excellence, Equity, and Joy**. These Values drive our work and culture. Pfizer's Blue Book, our Code of Conduct, is designed to uphold these Values, and reinforce our culture of quality and integrity. It outlines our operational principles and standards for ethical conduct, emphasizing the importance of our open door culture and speaking up—a key aspect of our Value of Courage. Seeking advice, fostering psychological safety, asking questions, raising concerns, and reporting misconduct are vital to delivering breakthroughs patients can trust.

At Pfizer, everything we do starts with trust, because trust is everything. Each of us is accountable for understanding the Blue Book and adhering to our Code of Conduct every day. By doing so, we live our Values and earn the trust of the patients we serve.



Dr. Albert Bourla

Chairman & Chief Executive Officer



Trust Is Everything

We Live Our Values &
Are All Responsible

Courage

Excellence

Equity & Joy



We Live Our Values and Are All Responsible

At Pfizer, we do the right thing because patients' lives depend on us. Patients put their trust in us, and we honor that trust by speaking up whenever safety, quality, or integrity are in question. We are ethical leaders. We act 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 go further, faster, better — because patients are waiting. Ethical decisions promote trust and accountability for doing the right thing, both internally and externally.



To fully realize Pfizer's purpose—breakthroughs that change patients' lives—we have established clear expectations regarding what we need to achieve for patients and how we will achieve those goals. The “how” is represented by our four powerful Values—Courage, Excellence, Equity, and Joy—

that define our Company and our culture. Our commitment to integrity is absolute because trust is everyone's responsibility. When we communicate responsibly and execute with quality and integrity every day, we maximize our patient reach and impact, bringing us closer to our ambition of changing a billion lives a year.

Each of us is responsible for living our Code of Conduct and holding each other accountable for the same. The Blue Book applies to everyone, including all colleagues and officers of Pfizer and its subsidiaries. In certain circumstances, this Code also applies to contracted resources. Managers set the tone and model ethical behavior, cultivate an inclusive Open Door culture, and communicate the expectation that each of us must live our Values of Courage, Excellence, Equity, and Joy every day.

Remember, not following our Code may harm our Company, colleagues, patients, customers, communities, business partners, and investors. Violation of the Code or policies may result in disciplinary action up to and including termination of employment.

The Code does not answer how to act in every situation, but it does outline the Values and principles you need to guide you in your daily work. It also provides information on how to seek further guidance, ask questions, and raise concerns.



Courage. Breakthroughs start by challenging convention, especially in the face of uncertainty or adversity. This happens when we think big, speak up, and are decisive.



Excellence. We can only change patients' lives when we perform at our best together. This happens when we focus on what matters, agree who does what, and measure outcomes.



Equity. We believe that every person deserves to be seen, heard, and cared for. This happens when we are inclusive, act with integrity, and reduce healthcare disparities.



Joy. We give ourselves to our work, and it also gives to us. We find joy when we take pride, recognize one another, and have fun.

Our Values guide us in our daily work.
That is why they are incorporated into every section of this Blue Book.

Trust Is Everything

Courage

Excellence

Equity & Joy

We Speak Up, Keep Open Doors,
and Do Not Retaliate

We Raise Concerns

Ways for You to Speak Up



We Speak Up, Keep Open Doors, and Do Not Retaliate

Speak Up

Speaking up requires Courage. As Pfizer colleagues, we share the privilege and responsibility of ensuring we honor our Values and follow policies, including by speaking up when we have questions or concerns. Speaking up helps us learn about issues and manage risks before they become problems. The environment we need for breakthroughs depends on empowering each of us to speak our mind.

Speak up if you have an idea. Speak up if you have a question. Speak up if you have a concern. Our Open Door Policy provides many avenues for you to speak up without fear of retaliation, harassment, discrimination, or other inappropriate behavior.

We do not tolerate retaliation against those who raise concerns at Pfizer.

If you seek advice, raise a concern, report misconduct, or provide information in an investigation, you cannot be retaliated against for having done so. If you believe that you or another colleague has been retaliated against for any reason, report the conduct using any method described in this Blue Book.

COURAGE

Our Commitment to Courage

- We encourage reporting by not tolerating retaliation in any form.
- We report all suspected retaliation.

Retaliation is adverse action that can take various forms, including unfavorable work assignments, unfavorable performance reviews, threats, harassment, demotion, suspension, reduced compensation, denial of benefits, or termination, among others.



Expand Colleague Knowledge

- Corporate Policy 702 (Open Door Policy)
- Corporate Policy 201 (Integrity, Compliance Reporting Obligations, and No Retaliation Policy)

We have the Courage to speak up if something doesn't seem right.



We Raise Concerns

Speak Up

If you suspect potential misconduct, report it. We value, respect, and review all reports. Potential misconduct includes failing to follow laws, regulations, policies or procedures, or failing to live our Values. You can raise concerns to your manager, another manager, People Experience, the Legal Division, the Employee Relations Group, or the Compliance Organization (Compliance). You can also make anonymous reports to the Compliance Helpline (subject to local restrictions).

Your concerns will be analyzed and addressed by the appropriate Pfizer group according to our policies and procedures. For example, significant potential, suspected, or actual violations of law or policy—referable compliance issues (RCIs)—will be investigated exclusively by Compliance.

COURAGE

Our Commitment to Courage

- We raise concerns when safety, quality, or integrity are in question.
- Compliance responds promptly to all questions and reported concerns, takes appropriate action to investigate RCIs, and refers non-RCIs to the appropriate function for handling.
- Confidentiality is maintained to the fullest extent possible.

Personal Disclosure Requirements



If you have been excluded, debarred, or suspended, or become otherwise ineligible to participate in U.S. federal healthcare or procurement programs, you must disclose this immediately to Compliance. You also must disclose if you are under investigation for certain criminal offenses and may become excluded, debarred, or suspended.



We live our Values.

What happens when we raise concerns about safety, quality, or integrity?

We ensure that those concerns are timely assessed, understood, and mitigated by relevant professionals and experts. This is vital to protecting our patients, maintaining stakeholder trust, and safeguarding the company's reputation.

Expand Colleague Knowledge

- Corporate Policy 702 (Open Door Policy)
- Corporate Policy 201 (Integrity, Compliance Reporting Obligations, and No Retaliation Policy)



Speak Up

Ways for You to Speak Up

Discuss questions, ideas, and concerns without fear of reprisal. Many people are available to help; consult the person or group with whom you feel most comfortable.



Management

- Your manager or someone else in your division
- Any other manager
- Company leadership

People Experience

Contact People Experience (PX) for any concerns you may have.

- Your local People Experience representative

Employee Relations

Contact Employee Relations directly to ask questions or raise concerns. Employee Relations are neutral and objective investigators who uphold Company Values and policies in support of the Open Door Policy.

- [USA and Puerto Rico](#)
- Global: Contact your Employee Relations Regional Lead

Compliance

Contact Compliance directly to ask questions, present ideas, or raise concerns. Compliance website includes additional policies, procedures, and resources.

- Your Compliance contact
- Email corporate.compliance@pfizer.com
- Compliance Website: <http://integrity.pfizer.com>
- +1-212-733-3026
- +1-917-464-7736 (secure fax)
- Pfizer Inc
c/o Pfizer Compliance Organization
66 Hudson Boulevard East
New York, NY 10001-2192

Helpline

The Compliance Helpline provides a way to report concerns or get advice, 24 hours a day, 7 days a week, 365 days per year. Anonymous reporting is available in many locations, subject to local laws.

- Visit pfizer.ethicspoint.com to make a report
- Visit helpline.pfizer.com for local phone numbers
- Visit raisingcomplianceconcerns.pfizer.com for information for your location
- In the U.S.: 1-866-866-PFIZ (7349)

Legal Division

Contact the Legal Division for any concerns you may have.

- Your local Legal representative
- Legal Division leadership

Office of the Ombuds

Pfizer's Office of the Ombuds provides a safe, informal place where colleagues can confidentially get information and guidance to help address and resolve work-related issues. Conversations with the Office of the Ombuds are "off-the-record" and not disclosed to anyone unless they involve a risk of physical harm. The Ombuds Office, in its discretion, is also able to raise trends to leadership when multiple colleagues come to the Office with the same issue. This allows the colleagues' concerns to be elevated without identifying them.

- From the USA, Canada and Puerto Rico, call us toll-free at 1-855-733-6623. For all other numbers, [Contact Us](#)
- Email us at ombuds@pfizer.com
- For more information, visit our website: ombuds.pfizer.com



Trust Is Everything

Courage

Excellence

Equity & Joy

For Our Patients

With Our Products and
Product Development

In How We Conduct Our Business

In Acting Ethically &
Following the Law



For Our Patients

Speak Up

Interactions With Patients and Patient Advocacy Groups

Patients and patient advocacy groups (PAGs, also patient organizations) play a crucial role in advancing our purpose. Their unique insights and collaborative interactions help shape our research and clinical endeavors, disease awareness programs, innovate new approaches to address patient challenges and drive efforts to support access through policy engagement.

All interactions with patients and PAGs must adhere to all applicable laws, regulations and industry codes. Building and maintaining trust with patients and advocates is also essential. As such, our interactions must be guided by principles of independence, transparency and mutual respect, and reflect consideration of the patient or PAG's interests and mission.

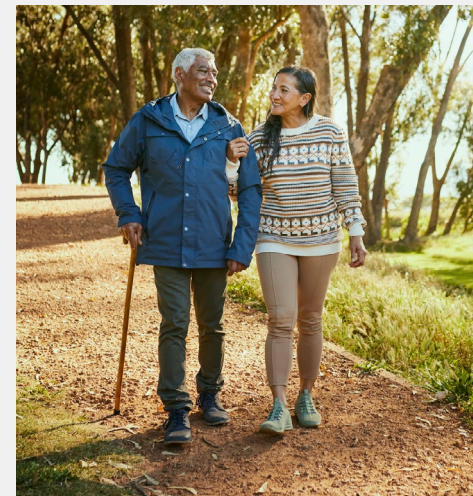
Patient advocacy groups are generally defined as independent not-for-profit entities that represent the needs of people living with medical conditions, their families, or other caregivers.

Considerations for Patient & PAG Interactions:

- The purpose of your engagement must address a legitimate need.
- Consult global and local policies to ensure compliance with all relevant policies, laws, regulations, and industry codes.
- We fully respect the independence and autonomy of patients and PAGs. Avoid any conduct that could be perceived as undermining their independence.
- Before connecting with a PAG, consult the relevant Patient Engagement Lead.

Independent Charity Patient Assistance Programs (ICPAPs): All patients deserve access to quality healthcare and medicines prescribed by their physicians. Charitable contributions to Independent Charity Patient Assistance Programs ("ICPAPs") can provide a means to help patients access their medicines by providing assistance for co-pay, deductible and/or premium obligations for prescriptions. However, any such donations are subject to certain legal and regulatory requirements.

To ensure such compliance, Pfizer policy places strict limits on colleagues' interactions with, donations and allocations to, and data from or about ICPAPs. Additionally, Pfizer's Global Health & Social Impact group has sole responsibility for management of donations to ICPAPs.



Expand Colleague Knowledge

- Corporate Policy 208: (Interactions with Patients and Patient Advocacy Groups)
- For local requirements on interactions with patients and PAGs, please consult the MAPP Country Annex Portal.



For Our Patients

Speak Up

Interactions With Healthcare Professionals and Customers

We interact with healthcare professionals and other customers in many ways, including through research and development, market access, educational, and promotional activities. We are committed to the highest standards of excellence and we act with integrity and transparency in every aspect of our relationships with healthcare professionals.

EXCELLENCE

Our Commitment to Excellence

- We consider how our interactions with customers may appear and do not engage in illegal or unfair activities, such as false or misleading advertising, bribery or corruption, or making unfair comments about competitors' products.
- We are committed to acting with integrity in all marketing practices, including labeling, promotional programs, product samples, and communications with stakeholders.
- We provide timely and honest product information to patients, consumers, healthcare professionals and regulators worldwide, providing appropriate uses for our products and the efficacy and safety data relating to those uses.
- We recognize our interactions with healthcare professionals and their organizations can cause apparent or actual conflicts of interest; therefore, we support the disclosure of financial and other interests and relationships with healthcare professionals in research, education, or clinical practice.
- Pfizer is deeply committed to patient centricity and recognizes the importance of interacting with patients and Patient Assistance Groups (PAGs) to understand and appropriately support their needs as we advance our Purpose. Engagements with patients and PAGs focused on areas of mutual interest have the potential to increase patient engagement in research and development, diversify clinical trials, develop patient-friendly educational materials and programs, and elevate priority policy and social impact issues that improve patient outcomes.

We provide regular training and awareness for sales representatives regarding ethical marketing, and all of our promotional materials are subject to appropriate review and approval to ensure that they meet applicable regulator and scientific standards.



The definition of “healthcare professional” includes physicians, nurses, pharmacists, and any others who administer, prescribe, purchase, recommend, or are in a position to influence the use of our products.

Expand Colleague Knowledge

- Corporate Policy 201 (Integrity, Compliance Reporting Obligations, and No Retaliation Policy)
- Corporate Policy 208: (Interactions with Patients and Patient Advocacy Groups)
- My Anti-Corruption Policy and Procedures (MAPP)
- Corporate Policy 207 (Global Policy on Interactions with Healthcare Professionals)
- Global Content Policy – Commercial Standards for Promotional Materials
- GCO Policy Exchange
- Global HCP/HCO Transparency Reporting SOP



With Our Products and Product Development

Speak Up

Research and Development

Our purpose is to bring innovative medicines and vaccines to patients that significantly improve their lives. We are committed to protecting the people who take part in our clinical trials, and to upholding the highest ethical, scientific, and medical standards in all our research and development activities.

We are all responsible for acting in a manner consistent with Pfizer's high expectations for excellence and integrity in research and development.

EXCELLENCE

Our Commitment to Excellence

- We are committed to conducting our research and development in compliance with all applicable laws and regulations and ethical guidelines related to good laboratory practices (GLP) and good clinical practices (GCP).
- We are committed to maintaining the integrity and quality of clinical data from our sponsored studies to ensure that our regulatory submissions are founded on data of the highest quality.
- We are committed to protecting the rights, safety, and well-being of research participants.
- Whenever possible, we seek alternatives to animal testing and support the development and adoption of non-animal validated test methods to assess the safety and efficacy of potential new products. Where animal testing is needed, we maintain high standards of animal care and welfare consistent with or exceeding those required by law and relevant external oversight bodies.



We innovate—courageously and responsibly.



With Our Products and Product Development

Speak Up

Manufacturing and Supply Quality

Our patients rely on Pfizer products to improve health and enhance the quality of their lives. This can only happen if our products are of high quality, safe, and effective.

We are committed to ensuring that our products are manufactured and supplied to high standards of quality, safety, and efficacy, assured through deployment of our robust quality management systems and our focus on the integrity of our data.



EXCELLENCE

Our Commitment to Excellence

- We conduct manufacturing operations in compliance with applicable regulatory requirements, good manufacturing practices (GMP), and our internal rigorous quality standards.
- We require that suppliers and partners operate in compliance with applicable regulatory requirements and GMP standards, and we conduct audits and oversight of our supply chain to ensure the quality, safety, and efficacy of our products.



We keep quality and integrity at the heart of what we do, always.

Expand Colleague Knowledge

- Corporate Policy 114 (Corporate Quality Policy)



With Our Products and Product Development

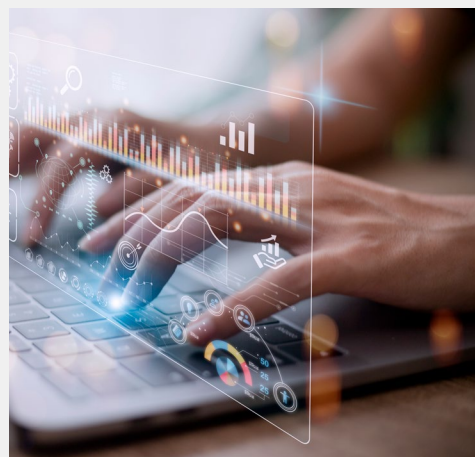
Speak Up

Data Integrity

As a science-based Company, the integrity of our data is of critical importance. Its accuracy, completeness, and trustworthiness provide assurance to our regulators, patients, and customers that our products and processes are of the highest quality—safe, effective, and protective of our patients, employees, and communities.

We maintain the integrity of our data using five key principles: Attributable, Legible, Contemporaneous, Original, and Accurate (the ALCOA principles). When our data is recorded in a manner consistent with ALCOA, it means that who recorded the data is known (attributable); that it can be reliably read, viewed, or used (legible); that it

was recorded at the time of the event (contemporaneous); that it is the source or authentic record and not an unauthorized copy (original); and that it is accurate.



If you can't trust the data, then you can't trust the product!

Safety Reporting

We are committed to providing products that are safe, effective, and of the highest quality. That is why we all share responsibility for reporting safety, quality, and performance issues concerning Pfizer products, no matter how we learned of the issue.

If you become aware of an adverse event or other issue with a Pfizer product, make sure to report it within 24 hours of receiving the information.

At a dinner party, a Pfizer colleague learns that her friend used a Pfizer product and experienced a headache. Does she need to report this?



Yes. Regardless of how she learns of the event, the severity, or whether she thinks it was a side effect of the Pfizer product, it is her responsibility to report it within 24 hours of learning about it.



Expand Colleague Knowledge

- Corporate Policy 903 (Your Responsibility to Report Information About the Safety, Quality, and Performance of Pfizer Products)
- Your Reporting Responsibilities (YRR) website
- How to Report



In How We Conduct Our Business

Speak Up

Business Partners and Suppliers

We work with third parties—suppliers, distributors, and other business partners—around the world to help us achieve our strategic goals. Engaging with third parties, however, can create compliance, financial, safety, information security, and other risks. These risks may result in operational disruption, regulatory penalties, or reputational damage. Performing due diligence and responsible selection and management of our third parties is core to how we do business. Pfizer holds its business partners to high standards, and they must comply with all laws and relevant policies and procedures that apply to their work conducted on Pfizer's behalf.

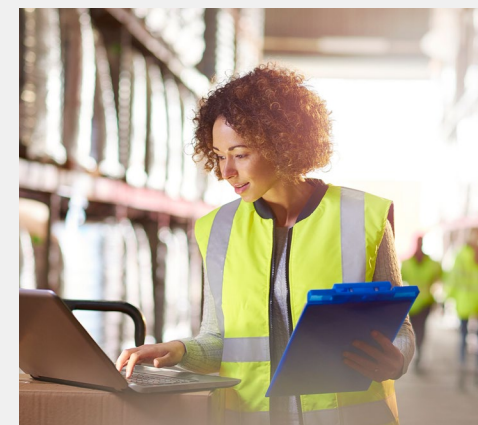


EXCELLENCE

Our Commitment to Excellence

- We carefully manage risks related to engaging third parties, including through controls and policies that help us identify, assess, and mitigate the risks we may encounter.
- We partner with external suppliers that are committed to operating in a responsible and ethical manner, respecting the rights of the individuals they employ, and helping to protect the environment.
- We expect our suppliers to operate in a manner consistent with our Supplier Conduct Principles and the Pharmaceutical Supply Chain Initiative (PSCI) Principles for Responsible Supply Chain Management.

We always do the right thing—because patients' lives depend on us.



Expand Colleague Knowledge

- Corporate Policy 113 (Environmental Health and Safety Policy)
- Corporate Policy 122 (Third Party Risk Management Policy and Procedure)
- Pfizer Supplier Conduct Position Statement
- Pfizer Supplier Conduct Principles
- My Anti-Corruption Policy and Procedures (MAPP)
- Third Party Risk Management (TPRM) Resource Center



In How We Conduct Our Business

Speak Up

Conflicts of Interest

We are accountable for avoiding situations that present potential or perceived conflicts of interest between our personal interests and those of Pfizer. A conflict of interest arises when we place our personal, social, financial, or political interests before the interests of the Company.

Many potential conflicts of interest can be resolved. First, we must disclose any potential conflicts to our managers. Managers must then determine next steps, including consulting with Legal, Compliance, and People Experience when potential conflicts are significant or complex.

Use the Conflicts of Interest system in Fuse to disclose and resolve your conflict, or contact your Manager or Compliance to determine appropriate steps.

EXCELLENCE

Our Commitment to Excellence

- We do not allow outside businesses or other interests to affect our objectivity, motivation, or performance. We must be attentive, be transparent, and be accountable to ensure that conflicts are identified, disclosed, and managed.



Potential conflicts of interest include:



- Outside job or role, especially with a competitor or potential Pfizer customer or supplier
- A personal investment or business opportunity presented to a colleague that directly relates to their job functions for Pfizer or Pfizer's business, including substantial financial interest in a Pfizer competitor
- Having a close family relationship with a government official whose role relates to Pfizer or healthcare
- Receiving a gift from a business associate or supplier of Pfizer, or someone who is seeking to work with Pfizer
- Serving on a board of a company, including a local non-profit in the healthcare industry
- Otherwise taking advantage of Pfizer's corporate opportunities for personal gain



Expand Colleague Knowledge

- Corporate Policy 203 (Conflicts of Interest (COI) Policy)
- My Anti-Corruption Policy and Procedures (MAPP)
- Corporate Policy 301 (Colleague Travel, Entertainment, and Other Business-Related Expenses)
- Corporate Policy 102 (Purchasing Policy and Procedure)



In How We Conduct Our Business

Speak Up

Company Assets, Records, and Information

One way we protect Pfizer, each other, and our patients is by protecting Company assets. These assets include, for example, physical and intellectual property, equipment, services, records, ideas, and Pfizer's sensitive information. We are accountable for ensuring appropriate use of Pfizer systems and networks to securely create, transfer, or store Pfizer-related business information. This includes connecting only approved technologies, devices, and applications to the Company network.

EXCELLENCE

Our Commitment to Excellence

- We secure all confidential information, whether spoken or written, when working remotely or in an open environment, and dispose of information properly.
- We use only authorized software, devices, and applications approved by Pfizer.
- We limit our personal use of Pfizer information systems.
- We comply with Pfizer's corporate policies regarding safeguarding sensitive information, record retention, information incident reporting, and cybersecurity.



Pfizer must protect our information and operations from misuse, data breaches, and other security threats, which can have serious negative consequences to the Company, our employees, and our customers. In accordance with applicable law, Pfizer uses a variety of tools and processes to monitor and assess the use of and to help protect Pfizer information systems and data.

Prohibited activities: You may not use Pfizer information systems or devices to:

- Harass, discriminate, or create a hostile workplace
- View or otherwise post data that is defamatory, illegal, pornographic, or obscene
- Perform activities that interfere with work or result in the loss or damage of work or systems
- Solicit colleagues for any unauthorized purpose
- Record communications without authorization

Take appropriate precautions to protect your Pfizer devices and data, even within Pfizer facilities. If you work in an open space environment, activate the system lock when leaving the device. Do not leave your devices unattended in any location where security is not reasonably assured. In public settings, ensure that sensitive information cannot be viewed or overheard by others.

Expand Colleague Knowledge

- Corporate Policy 401 (Safeguarding Sensitive Information)
- Corporate Policy 403 (Acceptable Use of Information Systems)
- Corporate Policy 405 (Records & Information Management Policy and Procedure)
- Corporate Policy 411 (Information Incident Response Policy)
- Corporate Policy 412 (Cybersecurity Policy)
- Enterprise Records and Information Management
- Enterprise Record Retention Schedule
- Handling Sensitive Information Guidelines
- Protect Pfizer
- Legal Hold Listing

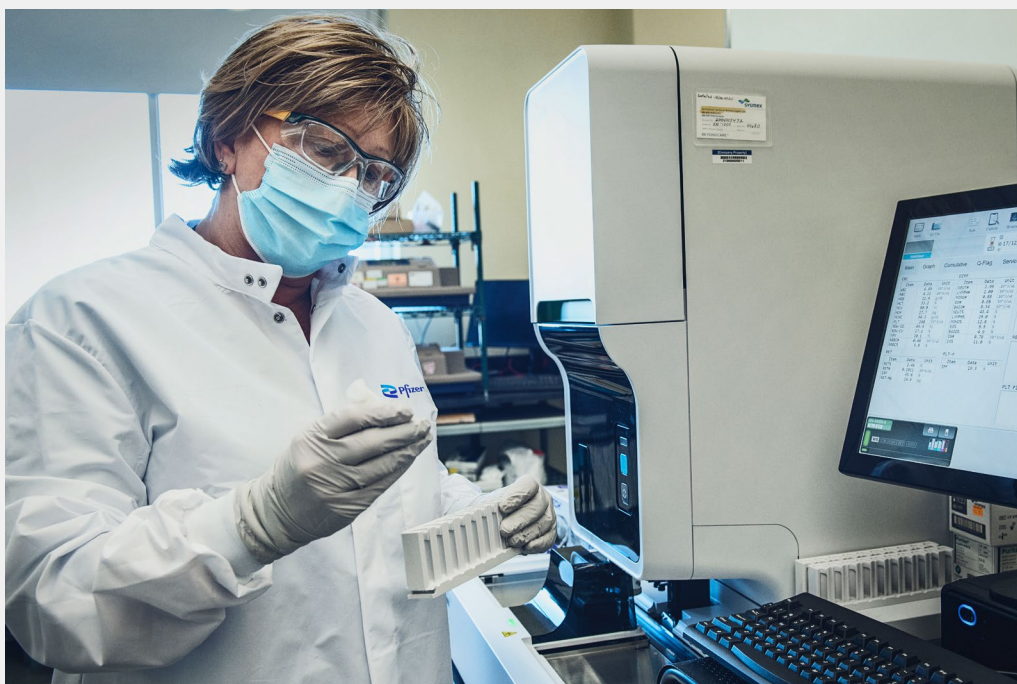


In How We Conduct Our Business

Speak Up

Intellectual Property

Protecting Pfizer's intellectual property is essential to maintaining our competitive advantage. We support the establishment, protection, maintenance, and defense of Pfizer's intellectual property rights and use those rights in a responsible way. We also respect the intellectual property of others.



EXCELLENCE

Our Commitment to Excellence

- We enforce Pfizer's intellectual property rights in a responsible way.

If intellectual property is protected in one country, is it protected in other countries?

Not necessarily. For example, patents and trademarks are territorial rights. The Legal Division's Intellectual Property Group tracks the status of the Company's assets and can help you determine whether something has protected status in a country.

Intellectual property includes patents, trademarks, trade dress, trade secrets, and copyrights, as well as scientific and technical knowledge, know-how, and experience.

Expand Colleague Knowledge

- Copyright Compliance Guidelines
- Intellectual Property Portal



In How We Conduct Our Business

Speak Up

Personal Data

We protect personal data, including that of colleagues, third parties, and HCPs and patients. Pfizer is entrusted with personal data for purposes of conducting research, pharmacovigilance, and other business activities.

We are accountable for protecting personal data and for only using that data in accordance with Pfizer's policies and procedures, and applicable laws and regulations.

EXCELLENCE

Our Commitment to Excellence

- We collect and use the minimum amount of personal data necessary to achieve our business purposes and keep it only as long as necessary to achieve those purposes.
- We share personal data only with individuals who have a legitimate need for it and will protect it.
- We report concerns about the inappropriate disclosure of personal data to our managers and Pfizer Resilience Center (PRC).

What if I must share personal data with third parties to meet business needs?

You must ensure that third parties can protect personal data and will use it only to provide services to Pfizer, and that there is an appropriate contract in place that addresses protection of personal data. In some jurisdictions, other requirements may apply. Seek guidance from Legal before providing any personal data to third parties.



Personal data is information that can directly or indirectly identify an individual, such as a name, contact information, or health related and genetic information.

Expand Colleague Knowledge

- Corporate Policy 404 (Protecting the Privacy of Personal Data)
- Corporate Policy 411 (Information Incident Response Policy)
- Global Privacy Office
- Pfizer Resilience Center (PRC)



In How We Conduct Our Business

Speak Up

Artificial Intelligence (AI)

We recognize that AI-related capabilities are increasingly important to enable the use of data analyses and insights to efficiently and effectively execute our Purpose Blueprint and advance health. When we leverage AI in our work, we do so ethically and responsibly, consistent with our Values and Pfizer's Responsible AI guiding principles.

EXCELLENCE

Our Commitment to Excellence

- We believe in the importance of human oversight and strive to develop and deploy AI that is safe, sustainable, reliable, and secure, and that empowers humans and promotes fairness and equity.
- We take appropriate measures to assess and mitigate risks when developing, procuring, and deploying AI.
- We protect sensitive data and respect our patients' and other individuals' need for privacy and transparency in the utilization of AI.

Artificial Intelligence (AI)

is a machine-based process or technology that can infer, based on the input it receives, how to generate outputs such as predictions, recommendations, decisions, or new content or summaries.



Expand Colleague Knowledge

- Corporate Policy 413 (Artificial Intelligence Risk Management)



In How We Conduct Our Business

Speak Up

Financial Integrity

Accurate business records are essential to our business operations and safeguarding investor confidence, and we maintain strong internal controls and accounting policies to ensure the accuracy, completeness, and reliability of Company accounting records and publicly-filed financial statements.

We each must exercise sound financial judgment and ensure our business records are correct and accurately reflect our work—from time sheets and invoices, to expense reports and benefits records. We all must watch for suspicious or inaccurate transactions, invoices, or payments made to or on behalf of Pfizer. This helps Pfizer provide full, accurate, and timely financial and other disclosures to the public and governments around the world.



*We achieve Excellence
when we are accountable
for our actions.*

Social Media

One of the most powerful tools we have to communicate Pfizer's stories of innovation, patient centricity, and colleague commitment is social media. We are all accountable for using social media responsibly, whether creating or using social media in our personal lives or on behalf of Pfizer.

EXCELLENCE

Our Commitment to Excellence

- We do not disclose material nonpublic information or other confidential, proprietary, or personal information on social media.
- We do not reference Pfizer products or content related to specific pipeline or in-line products on social media unless our use and reference has been approved by Legal.



Expand Colleague Knowledge

- Corporate Policy 511 (Integrity of Pfizer's Books and Records)
- Corporate Policy 407 (Social Media Policy)



In How We Conduct Our Business

Speak Up

External Inquiries

Government

We fully cooperate with government authorities in connection with proper requests for information. Non-routine government requests may expose Pfizer or colleagues to civil or criminal liability, so we immediately notify a member of the Legal Division if we are contacted by any government authority for such information at a Pfizer facility, at our homes, or otherwise.

Media, Analyst, Investor, and Public

We are committed to delivering accurate and reliable information to the media, financial analysts, investors, and other members of the public. Therefore, only Global Media Relations is authorized to answer questions from the media, and only Investor Relations is authorized to answer questions from financial analysts and investors.



We achieve Excellence when we know our standards and live by them.

Expand Colleague Knowledge

- Corporate Policy 602 (Government Investigations: Requests for Information or Facility Visits)
- Corporate Policy 604B (Treatment and Disclosure of Material Nonpublic Information – Regulation Fair Disclosure)
- Media inquiries: Global Media Relations Press Office at +1-212-733-1226
- Analyst and investor inquiries: Investor Relations at +1-212-733-2668



In Acting Ethically & Following the Law

Speak Up

Our industry is subject to many rules and regulations designed to protect patients and consumers, ensure the quality and safety of medicines and healthcare services, and help eliminate fraud and improper influence on medical judgment. We demonstrate our commitment to Excellence by following all laws and regulatory requirements governing our activities, including in the development, manufacturing, distribution, marketing, government contracting, sale, and promotion of our products.

At Pfizer we deter unethical behavior by emphasizing the importance of colleagues complying with our policies through training and communications. We monitor signals for potential policy violations, and respond with appropriate discipline.



EXCELLENCE

Our Commitment to Excellence

- We evaluate each transaction to ensure it serves a legitimate purpose.
- We rigorously verify that every transaction reflects appropriate value and that all interactions adhere to local laws.
- We exercise utmost diligence when engaging with government employees or private individuals who possess the actual or perceived influence to impact our business decisions.
- We take full ownership and responsibility for our business activities, fully aware of the processes, risks and potential for perceived impropriety. We hold ourselves accountable and act with integrity at all times.
- We accurately document all transactions in sufficient detail.



In Acting Ethically & Following the Law

Speak Up

Protecting Integrity: Our stance against Bribery, Corruption, and Kickbacks

We are committed to conducting our business with unwavering transparency and the highest ethical standards. We firmly reject all forms of bribery and corruption, holding both our colleagues and business partners accountable for upholding these principles.

Colleagues and business partners must never offer, promise, authorize, or provide a payment or benefit that is intended to improperly influence a government official, healthcare professional, or any other person, including commercial entities and individuals, in exercising their responsibilities.

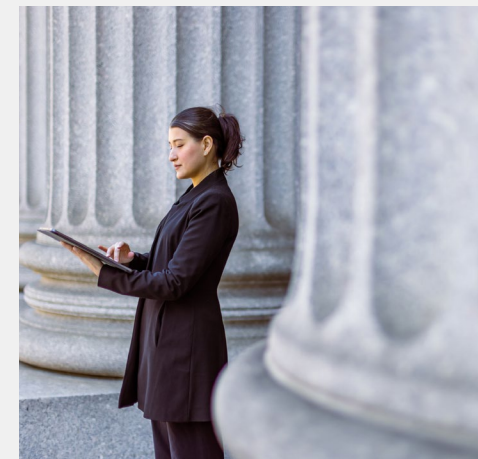
In our interactions with healthcare professionals associated with government or regulatory authorities, we prioritize compliance with all relevant laws, regulations, professional standards and industry codes of conduct. We are committed to upholding local transparency and anti-kickback regulations to ensure ethical and responsible practices.



Why is it essential to thoroughly understand my business partner?



Knowing our partners includes understanding healthcare professional and government official status and may also include understanding professional qualifications, employment position, and the ability to influence government decisions that could benefit Pfizer's business. We must ensure that our business partners meet Pfizer's high standards for expertise and integrity. We also must identify any real or perceived risks associated with our business partners. Collecting this information enables us to assess the appropriateness of our interactions, and identify and manage any risks. Being well informed helps us make better decisions that ultimately benefit the patients we serve.



Expand Colleague Knowledge

- Corporate Policy 207 (Global Policy on Interactions with Healthcare Professionals (GPIHP))
- My Anti-Corruption Policy and Procedures (MAPP)
- ACPO website



In Acting Ethically & Following the Law

Speak Up

Antitrust, Fair Competition Laws & Competitive Intelligence

Antitrust and competition laws protect free enterprise and prohibit interactions between Pfizer and our competitors that affect prices, terms or conditions of sale, or fair competition. We ensure fair competition in all our business dealings, including, among other things, distribution agreements, rebates and discounts to customers, patent, copyright, and trademark licenses, territorial restrictions on resellers, and pricing policy generally.

We are committed to competing fairly and following the antitrust and competition laws of all countries in which we operate. Laws vary and are sometimes complex, so we consult with the Legal Division before interacting with competitors or engaging in business dealings which could unfairly restrict trade.

We also only collect and use business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations.



EXCELLENCE

Our Commitment to Excellence

- We do not permit direct or indirect discussions or contact with competitors about pricing, costs, terms or conditions of sale, or other competitively sensitive information.
- We do not permit direct or indirect discussions or contact with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace.

A friend and former Pfizer colleague now works for a Pfizer competitor. Is it okay to discuss how her company deals with managed care companies?

No. Competitively sensitive information may not be discussed with friends or former colleagues employed by competitor companies, whether in a business or a social setting.

- We do not allocate markets or customers with competitors. We do not engage in the boycott of customers or suppliers.
- We never use, or ask any third party to use, unlawful or unethical means, such as misrepresentation, deception, theft, spying or bribery to gather information about our competitors.
- We do not engage with competitors to discuss or rig bids or otherwise manipulate the bidding process with customers.
- We never use AI or GenAI for business practices that could be perceived as violating the antitrust and competition laws (e.g., using AI algorithm tools that collect confidential information from our competitors to set prices).



In Acting Ethically & Following the Law

Speak Up

Antitrust, Fair Competition Laws & Competitive Intelligence

Trade association meetings

and other **industry gatherings** can pose certain risks, as they bring together competitors who might discuss matters of mutual concern. Even joking about inappropriate topics—such as marketing or pricing strategies—could be misinterpreted. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter, leave the conversation immediately, and report the incident.

I want to know what patient recruitment exclusion criteria a competitor is using in a clinical trial. That information is not public. Can I pose as a potential patient recruit, call the research site, and ask questions?

No. Misrepresentation—not disclosing that you are a Pfizer colleague or posing as someone you are not—is an unethical way to gain access to a competitor's confidential information. All Pfizer employees and contracted resources are prohibited from directly collecting primary intelligence and must coordinate the initiation and execution of vendor-led primary competitive research projects with the Competitive Intelligence CoE and Legal Division in accordance with Corporate Policy 121.



Expand Colleague Knowledge

- Corporate Policy 603 (Compliance with Antitrust Laws)
- Corporate Policy 121 (Competitive Intelligence Policy and Procedure)



In Acting Ethically & Following the Law

Speak Up

Insider Trading Laws

Securities laws and Pfizer policy prohibit us from disclosing material nonpublic information (MNPI) to anyone outside Pfizer (unless in accordance with Pfizer policy) or trading in Pfizer securities while aware of any material nonpublic or “inside” information that we acquire during our employment at Pfizer.

Additionally, while in possession of material nonpublic information, we are also prohibited from buying or selling the securities of any other company with which Pfizer has or may be considering a relationship (such as a customer, supplier, research partner or potential acquisition or collaboration candidate). Information is generally considered nonpublic until it has been broadly disseminated to the public, and the

public has had a minimum of one full trading day to absorb the information. We also are prohibited from giving inside information to anyone else so that they can do so.

I am working with a co-promote partner company, and I've become aware that our partner company is on the verge of a major scientific breakthrough. Can I purchase some stock in our partner company?

No. Neither you nor anyone who lives in your household or is financially dependent on you can purchase this stock until the first business day after the information you have is known to the public. You also cannot give this information to anyone else so that they can trade on that information.

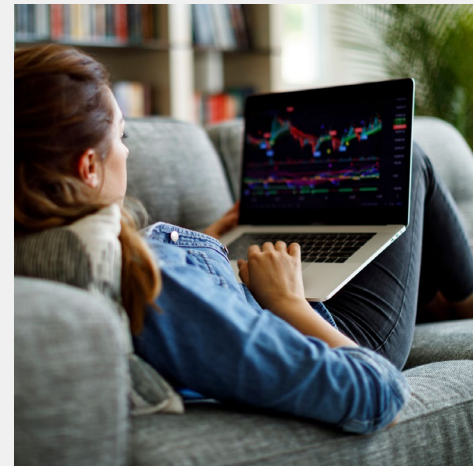
Material information is any information that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities.

Note that we are also prohibited from trading in Pfizer stock derivatives or hedging transactions related to Pfizer securities, such as short-sales, puts, calls, straddles, or equity swaps.

Global Trade Control Laws

We are all responsible for complying with import, export control, and economic sanctions laws that govern the transfer of certain products, items, software, and technology, as well as the performance of some services and interactions with third parties. Global trade control laws may restrict Pfizer's sales, investments, transactions, research, charitable contributions, and business activities with certain markets, entities, or individuals.

We direct all questions or concerns about global trade control laws to Pfizer's Global Trade Control Center of Excellence.



Expand Colleague Knowledge

- Corporate Policy 604A (Prohibition on Insider Trading)
- Corporate Policy 604B (Treatment and Disclosure of Material Nonpublic Information - Regulation Fair Disclosure)
- Corporate Policy 605 (Trading in Pfizer Stock Derivatives)
- Corporate Policy 401 (Safeguarding Sensitive Information)
- Corporate Policy 206 (Compliance with Global Trade Control Laws)
- Global Trade Controls Center of Excellence



Trust Is Everything

Courage

Excellence

Equity & Joy

We Engage in Responsible
Business Practices

We Respect Human Rights

We Prioritize Health
and Safety,
and Protect the Environment

We Support the Communities
in Which We Work

We Embrace Diversity,
Equity & Inclusion

We Do Not Tolerate Discrimination,
Harassment, or Retaliation



Pfizer is committed to fairness, cooperation, teamwork, and trust. We do not tolerate hostility, harassment, or retaliation. Our global policies prohibiting all forms of inappropriate behavior are intended to create a workplace that promotes a positive and productive environment that is aligned with our commitment to achieving our Purpose and supporting the communities in which we live and work through ethical decision-making based on our core values: Courage, Excellence, Equity, and Joy.

Our commitment to promoting our Values extends beyond our workplace to the communities in which we operate and the patients we serve. Pfizer is committed to sustainable and ethical business operations. We recognize the importance of Environmental, Social and Governance (ESG) issues. We are committed to respecting human rights, taking responsible climate action, reducing our environmental impact, lessening healthcare disparities, and prioritizing health, safety, diversity, inclusion, fairness, cooperation, and trust across our operations and supply chain.

We Engage in Responsible Business Practices

[Speak Up](#)

Pfizer is committed not only to advancing our Purpose, but to being a good corporate citizen. We take seriously our obligation to conduct ourselves in a way that makes the world a better place. Discovering, manufacturing, and delivering innovative vaccines and medicines is only part of what we contribute to society.

ESG priority areas

- Product innovation
- Climate change
- Equitable access and pricing
- Product quality and safety
- Diversity, equity, and inclusion
- Business ethics

ESG Reporting and ESG-related external communications present valuable opportunities for engagement. At the same time, they present risk to Pfizer if engagement is not aligned with Pfizer's enterprise ESG strategy. Contact the ESG Office (ESG.Office@pfizer.com) before creating or disseminating information on ESG-related topics.



EQUITY & JOY

Our Commitment to Equity & Joy

- Our governance of ESG is built on the principles of oversight by our Board of Directors, commitment by and accountability of leadership, and colleague engagement across the company. We also leverage diverse perspectives from internal and external stakeholders to inform our responsible business strategy and priorities.
- We encourage all colleagues to contribute to achieving our responsible business goals by understanding our priorities and advancing business in a sustainable, responsible way in their day-to-day activities.



Expand Colleague Knowledge

- Information on Pfizer.com
- Pfizer's Impact Report



At Pfizer, trust is everything as we apply science and our global resources to further our purpose. 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 raising concerns to speak up without fear of retaliation. 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.

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 work conditions; the right to a safe workplace; and the right to a clean, healthy, and sustainable environment.

We Respect Human Rights

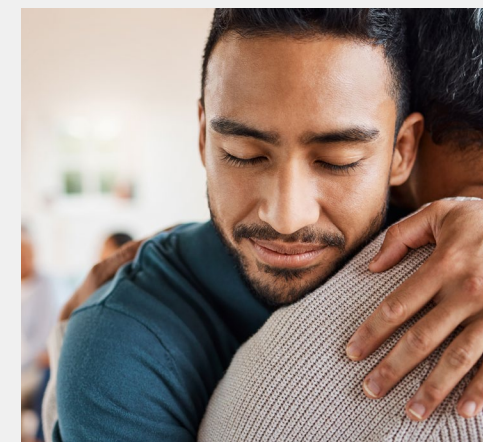
Pfizer is committed to conducting business in an ethical and responsible manner, which includes respecting internationally recognized human rights. In honoring our commitment, we seek to prevent and mitigate adverse human rights impacts in our global operations, and remediate any adverse human rights impacts we may inadvertently cause or perpetuate. 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 assessments.

EQUITY & JOY

Our Commitment to Equity & Joy

- Our responsibility to respect human rights extends throughout our operations, from lab to patient, including our diverse global supply chain of numerous local suppliers.
- In line with the UN Guiding Principles on Business and Human Rights, Pfizer's human rights policy statement 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.

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 and other international treaties and instruments.



Expand Colleague Knowledge

- Human Rights Policy Statement
- Human Rights FAQ
- Forced Labor, Child Labor, Human Rights, and Decent Working Conditions Regulatory Disclosures

Speak Up



We Prioritize Health and Safety, and Protect the Environment

Speak Up

Protecting the environment, and the health and safety of our colleagues, contracted resources, visitors and the communities in which we operate is a business priority and is core to Pfizer's Values of Excellence and Equity. We are committed to integrating climate action and sustainability into the lifecycle of our medicines to address global health challenges and preserve resources for future generations.



EQUITY & JOY

Our Commitment to Equity & Joy

- We are committed to running safe, compliant, and sustainable operations that comply with Environmental, Health and Safety (EHS) laws and internal standards.
- We actively seek and act upon meaningful opportunities to reduce risk and improve our EHS performance.
- We are committed to selecting business partners with consideration of their ability to run safe and environmentally responsible operations.
- We are committed to educating, training, and motivating colleagues to work in a safe, compliant, and environmentally responsible manner.

We take pride and feel Joy in our reputation for integrity.



Expand Colleague Knowledge

- Corporate Policy 113 (Environmental Health and Safety Policy)
- Global Environment, Health and Safety Standards



We Support the Communities in Which We Work

Speak Up

We are committed to actively participating in and improving the communities in which we do business. We believe better health is possible for everyone, everywhere. We seek to improve the well-being of people through responsible business actions and through sustainable social investments designed to improve access to medicines, vaccines, and quality health services and to reduce healthcare disparities. By working alongside our partners and patients, we can apply Pfizer's expertise and resources—including financial, products, and people—to help create lasting social impact.

EQUITY & JOY

Our Commitment to Equity & Joy

- We believe that people are the heart of Pfizer, and for our colleagues, contributing does not begin and end in the workplace.
- We apply our research, medicines, vaccines, funds, and the expertise of our people to make a meaningful difference in people's lives.
- Through partnerships with organizations, governments, and foundations, we work to address health disparities, create bridges and connections, and break down barriers to improve access to quality healthcare in our communities at home and abroad.
- We pair the professional expertise of our colleagues with the needs of nonprofit and international development organizations to help address pressing health challenges and bring breakthroughs to those in need.
- We find power and strength in community by coming together in the places we live and work to contribute financial support, time, and expertise.



Expand Colleague Knowledge

- Corporate Policy 801 (Global Charitable Contributions Policy)
- Commitment to Global Health
- Give Forward



We Embrace Diversity, Equity & Inclusion

At Pfizer, Equity means that every person deserves to be seen, heard, and cared for. This happens when we are inclusive, act with integrity, and reduce healthcare disparities.

We celebrate our differences with Joy and take action to advance diversity across our workforce and our business. We also are committed to ensuring that our workforce and business model reflect the diversity of the patients we serve, by employing a diverse array of colleagues, engaging diverse suppliers, and including diverse individuals in our research and clinical studies.



We are committed to providing equal employment opportunities to all of our job applicants and colleagues, and we treat them without regard to personal characteristics such as race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service or veteran status, medical condition (as defined by applicable law), presence of a mental or physical disability, or other characteristics protected by applicable laws. We continue to uphold a culture based on merit – one where hard work, talent, and contributions drive success, and barriers to opportunity are removed. We must hold ourselves accountable and be transparent with our actions and results because all of us have a role to play in advancing Diversity, Equity, and Inclusion.

EQUITY & JOY

Our Commitment to Equity & Joy

- We expect our managers to promote standards of equal employment and to report any potential violations of Pfizer's Equal Opportunity Policy.
- We cast a wide net for talent by partnering with external organizations that provide rich engagement opportunities with people of varying backgrounds, ethnicities, and other unique traits.
- We celebrate the unique qualities, perspectives, and life experiences that define us as individuals. We have the power—and responsibility—to create safe environments for our colleagues and support their growth.

- We also maintain a robust supplier program that ensures equitable access to all potential qualified vendors.
- We include individuals of varied races, ethnicities, ages, and genders in clinical trials to help improve the completeness and quality of demographic subgroup data reporting and analysis.

Expand Colleague Knowledge

- Corporate Policy 702 (Open Door Policy)
- Corporate Policy 703 (Equal Opportunity Policy)
- Corporate Policy 103 (Pfizer Supplier Diversity Initiative)

We Do Not Tolerate Discrimination, Harassment, or Retaliation

Speak Up

We promote and value a work environment free of discrimination, harassment, and retaliation, including bullying and mobbing as defined by applicable laws. All workplace decisions are made without regard to personal characteristics protected by applicable laws.

Our managers must maintain a work environment that is free of harassment, discrimination, retaliation, and bullying, and must report any such conduct of which they become aware.

EQUITY

Our Commitment to Equity

- We promote a work environment free from harassment, including any unwelcome comments, behaviors, actions, or conduct that denigrates or demonstrates hostility based on protected personal characteristic.
- We prohibit conduct that creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an individual's ability to work.



Pfizer is committed to providing you with a safe and secure workplace where you can do your best work every day. Workplace Violence Policy and the Workplace Violence Prevention and Intervention (WVPI) program are in place to aid all managers, colleagues, and contracted resources in proactively detecting, evaluating, and investigating behaviors of concern to mitigate threats.

It is critical that all of us take an active role to address workplace violence, doing our part to help enable a safe and secure workplace for all.

WPVI program's core verticals are—People, Training, Reporting, and Information Sharing which are in place to enable:

- A safe workplace for ALL
- Early behavior detection – having the Courage to Speak Up
- Expedited help to those in need
- Ability to “know & connect the dots” across the workplace violence continuum



We champion Equity when we act with integrity.

Expand Colleague Knowledge

- Corporate Policy 703 (Equal Opportunity Policy)
- Corporate Policy 117 (Workplace Violence Policy)
- Discrimination, Harassment and Retaliation Prevention Policy (US/PR)
- Corporate Policy 702 (Open Door Policy)
- Corporate Policy 201 (Integrity, Compliance Reporting, and No Retaliation Policy)
- Reporting Compliance Concerns
- Office of the Ombuds



Breakthroughs that change patients' lives