

Pfizer 2025

**Methodology Note Supporting
The Disclosure Report For
Transfers Of Value In 2024**

Pfizer Ukraine

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1. Introduction - Pfizer's Commitment to Transparency Reporting

We regularly work with healthcare professionals (HCPs) and healthcare organisations (HCOs) who advise us on a range of topics such as medicines development, the role of a medicine in a patient treatment pathway; health economics and clinical best practice. These interactions are essential to gaining the real-world information we need in order to deliver treatment choices that improve the health of patients and to share information that may be relevant to clinical decision making.

We are committed to transparency about how we operate as a business and about the relationships we have with HCPs and HCOs. Sharing information about these relationships in a straightforward and open way will, we hope, help explain the critical value these relationships bring to patient management.

We believe that transparency is essential to building and maintaining confidence in us and in our medicines and strongly support the work being done by The European Federation of Pharmaceutical Industries and Associations (EFPIA) to improve transparency across the pharmaceutical industry.

This methodological note presents how the transfers of value are categorized and in what format they are disclosed.

2. Transfer of Value Categories

The following table defines what transfers of value are reported in which EFPIA category and subcategory.

EFPIA category	EFPIA subcategory	Example Activities
Donations and Grants (HCOs only)	n/a	• Charitable contributions • Business Donations • Educational grants (e.g. fellowships, courses provided by an HCO where Pfizer does not select the individual HCPs participating) • Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants • Collaborative Agreements

Contribution to Cost of Events	Sponsorship agreements (HCOs only)	• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program • Funding an event in return for a display booth • Funding an event in exchange for advertising space • Other advertisement space (in paper, electronic or other format) • Satellite symposia at a congress • If part of a package: Name badges, drinks, meals etc. provided by the organisers (included in the sponsorship agreement) • Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies • Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according Pfizer’s Anti-Corruption Policies • For contributions provided to Events through Professional Conference Organisers (PCOs): TOVs through PCOs are reported as follows: - either in the name of benefitting HCO - or in the name of Recipient PCO
	Registration fees	• Registration fees paid for the HCP/HCO to attend events
	Travel & Accommodation	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking, shared ground transportation) • Accommodation • Travel Visa • Health Insurance linked to travel requirement
Fee for services and consultancy	Fees	• Speaker engagements • Advisory Boards* • Study-related engagements • Preceptorships • Post-marketing surveillance studies • Non-Interventional Studies that are Retrospective in nature • Medical writing • Data analysis

		• Development of education materials • General consulting / advising • Speaker training if linked to a speaker engagement • Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies
	Related expenses	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Travel Visa • Health Insurance linked to travel requirement
Research and Development Transfers of Value	n/a	• Clinical Trials • Data Monitoring Committees related to studies • Non-Interventional Studies that are Prospective in nature • Investigator Sponsored Research (ISR) • Clinical & Research Collaboration

* excluding Data Monitoring Committees related to studies which are disclosed in aggregate under R&D

3. Definitions

HCP: any natural person that is member of the medical, dental, pharmaceutical or nursing profession or any other person who, in the course of his/her professional activities, may prescribe, purchase, supply, recommend or administer a Medicinal Product and whose primary practice, principal professional address or place of incorporation is located in Europe. For the purposes of this Code, the definition of HCPs includes (i) any official or employee of a government, agency or other organisation (whether in public or private sector) that may prescribe, purchase, supply, recommend or administer Medicinal Products, and (ii) any employee of a Member Company whose primary occupation is that of a practicing HCP, but excludes (x) all other employees of Member Company and (y) a wholesaler or distributor of Medicinal Products

HCO: any legal entity (i) that is a healthcare, medical or scientific association or organisation (irrespective of its legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or scientific society (except for POs) whose legal address, place of incorporation or primary place of operation is located in Europe or (ii) through which one or more Healthcare Specialists provide their services

Covered Recipient – Any reportable HCP or HCO

PO/PAG – a non-profit legal person/entity (including the umbrella organisation to which it belongs), mainly composed of patients and/or caregivers, that represents and/or supports the needs of patients and/or caregivers, its legal address, place of incorporation or primary place of operation is located in Europe

TOV: Transfer of Value - Direct and indirect ToV, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of Prescription Medicines for human use. Direct ToVs are those made directly by a Member Company for the benefit of a Recipient. Indirect ToVs are those made on behalf of a Member Company for the benefit of a Recipient, or those made through a Third Party and where the Member Company knows or can identify the Recipient that will benefit from the Transfer of Value

4. Scope of Disclosure

This report includes transfers of value processed by Pfizer in Ukraine during the reporting period for 2024.

Timing of TOV: The disclosure report includes transactions which have a reportable date within the reporting period being disclosed.

Reportable date: the dates to be considered for disclosure reports are as follows:

In Cash TOV's – the clearing date is the reportable date

In Kind TOV's – meeting or event end date is the reportable date

TOV in case of No Shows or cancellation:

- Cancellation Fees are not reported
- No-shows are not reported if Pfizer cannot confirm the in-kind benefit was received

Multi-year contracts: Where contracts are valid for more than one year, each individual TOV is captured and disclosed in the reportable disclosure period.

Consent to publish & legal basis for disclosure of TOV's to individuals: Depending on the jurisdiction, Pfizer discloses the TOV based either on (i) a legal duty; (ii) legitimate interest (iii) the consent of the HCPs (and HCOs where it is applicable by country code/law) to the disclosure of the TOV made to them.

In markets where the consent is required for disclosure of TOV under the recipient's name. If the covered recipient has not provided consent for disclosure, the TOV are disclosed in the aggregate section of the report. This means that the transfer of value is not disclosed under the name of the HCP (or HCO for those markets where HCO consent applies), but as part of the sum of all the TOV.

Cross Border Reporting - TOV from Pfizer legal entities in other countries: The disclosure report includes TOV to HCPs and HCOs who practice in the disclosure report country. This includes all TOV (direct and indirect) made by any Pfizer affiliates in the European countries included in the EFPIA disclosure code. For non EFPIA countries, Pfizer will do their best effort to collect and disclose direct TOV made by Pfizer affiliates.

Currency: TOV are reported in local currency on the disclosure report. TOV 's made in a non-local currency are converted to local currency prior to publication. The Pfizer standard exchange rates for the TOV day of payment are applied.

Disclosure language: Disclosure reports will be published using the language as defined by the local trade association code/law.

PO/PAG inclusion in disclosure reports: PO's/PAGs will only be included in the disclosure report if they are in scope for reporting as defined in the country code/law

Value Added Tax (VAT): Treatment of VAT depends on the TOV:

Where possible In kind related TOV's will be reported **excluding tax**

Where possible Direct payment TOV's will be reported **excluding tax**

5. Publication

Publication/Republication: Pfizer will publish transparency disclosure reports in line with country timelines as defined by the trade association or government. Republication will be carried out as and when needed in line with local codes/laws.