

Pfizer 2020

**Disclosure Code Transparency
Report**

Methodological Note

Pfizer Belarus

1. INTRODUCTION.....	3
2. PFIZER ACTIVITIES PER EFPIA CATEGORY.....	4
3. SOURCES OF INFORMATION.....	6
4. DEFINITION OF THE TRANSFERS OF VALUE.....	7

1. Introduction

We regularly work with healthcare professionals (HCPs) and healthcare organizations (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 working relationships 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 want people to know, and understand, what we do and how we do it. 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.

The EFPIA Disclosure Code provides a common basis for reporting across Europe in relation to transfers of value (ToV). For more information on this Code visit: <http://transparency.efpia.eu>

Here in Belarus disclosure of ToV made to HCPs and HCOs during 2019 will be available no later than June 30th, 2020 on website www.pfizer.by

This report discloses all the ToV made to Health Care Professionals (HCPs) and Health Care Organizations (HCOs) in 2019. This methodological note presents some of the key aspects of how the transfers of value are categorized and in what format they are disclosed.

The ToV disclosed in this report cover all the payments made by Pfizer to HCPs and HCOs resident in Belarus.

2. Pfizer activities per EFPIA category

The following table defines what activities are reported in which EFPIA category and subcategory.

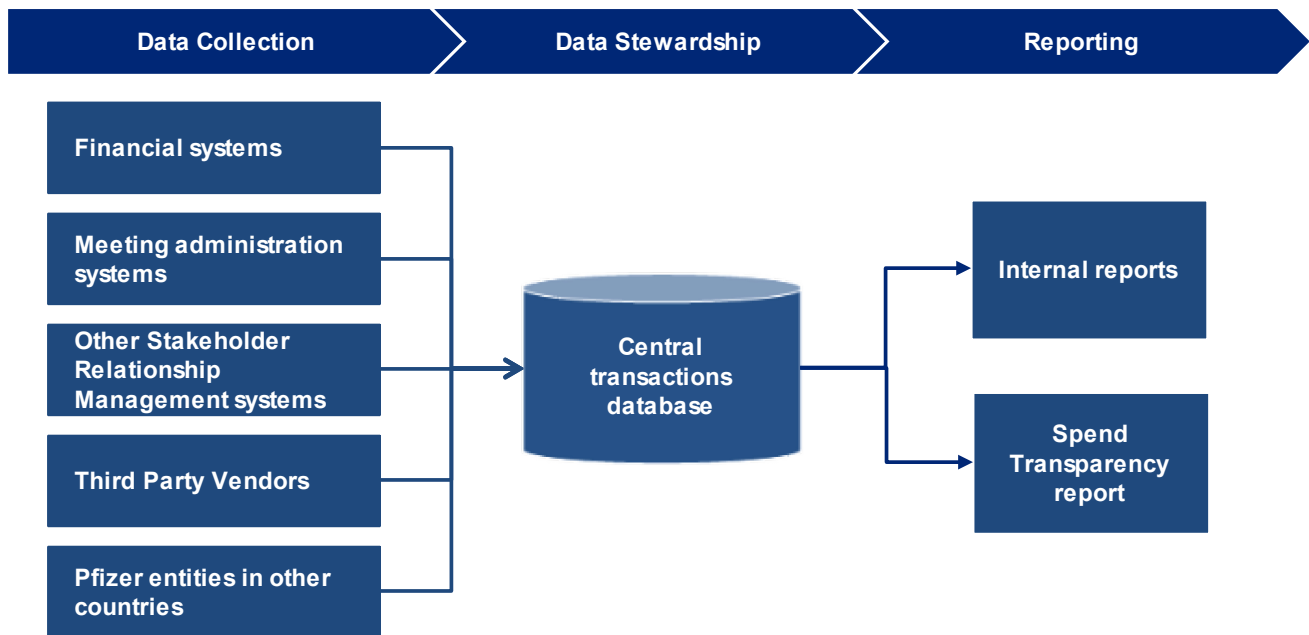
EFPIA category	EFPIA subcategory	Activities
Donations and Grants (HCOs only)	n/a	<ul style="list-style-type: none"> • Charitable contributions • Business Donations • Educational grants (e.g. fellowships, courses provided by a HCO where Pfizer does not select the individual HCPs participating) • Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> • 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 another format) • Satellite symposia at a congress • If part of a package: Name badges, drinks, meals etc. provided by the organizers (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 Organizers(PCOs): ToVs through PCOs are reported as follows: <ul style="list-style-type: none"> either in the name of benefitting HCO or in the name of Recipient PCO
	Registration fees	<ul style="list-style-type: none"> • Fees paid for the HCP/HCO to attend events not organized by Pfizer

	Travel & Accommodation	<ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Visa • Health Insurance linked to travel requirement [ONLY in case the following expenses are reimbursed: Health insurance, life insurance, travel to obtain visa (i.e. train to embassy). Otherwise delete this bullet]
Fee for services and consultancy	Fees	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Visa • Health Insurance linked to travel requirement [ONLY in case the following expenses are reimbursed: Health insurance, life insurance, travel to obtain visa (i.e. train to embassy). Otherwise delete this bullet]
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> • Clinical Trials • Data Monitoring Committees related to studies • Non-Interventional Studies that are Prospective in nature • Investigators Initiated Research (IIR) • Clinical & Research Collaboration

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

3. Sources of Information

The data for the ToV disclosed in this report are taken from a variety of source systems within Pfizer. Below is a high-level overview of the processes for collection and reporting of the data.



The ToV are collected from the internal and external data sources and systems and then fed into a central database where data is validated and stewarded. From the database, the disclosure reports are generated.

4. Definition of the Transfers of Value (ToV)

This section outlines some key aspects of how the ToV are defined.

Definition of HCP: Healthcare Professionals – healthcare providers, medical and pharmaceutical practitioners entitled to prescribe, recommend, purchase, supply and/or administer medicinal preparations in their professional activities.

Definition of HCO: Healthcare organization – a legal entity that mainly performs medical and (or) pharmaceutical activities.

Timing of ToV: This report discloses all ToV whose transaction date falls within the year 2019. The transaction date is defined as the clearing date in the financial system. In the case of meetings, it is the last day of the meeting.

ToV date: the dates to be considered for disclosure are:

Direct ToV: payment date

Indirect ToV: Reporting date is the date of the event.

ToV in case of partial attendances or cancellation:

- Cancellation Fees are not reported

- Transfer of value in case of HCP partially attending an event is disclosed

Multi-year contracts: Where contracts are valid for more than one year, each individual ToV is captured and disclosed in the corresponding reporting period.

Legal basis to disclose ToV regarding individuals: Pfizer Belarus discloses the ToV based on the individual consents of the HCPs (and HCOs who are individuals, as the case may be) provided in line with Belarus data privacy legislation to the disclosure of the ToV made to them. We make our best effort to advocate for transparency and explain its societal benefits. Our disclosures do not contain full governmental identifiers of the individuals at hand (unless imposed by local law) and technical measures have been adopted in the websites where the ToV are disclosed under our control to minimize to the extent possible that the individual names may be easily found through search engines.

As long as the legal basis is still valid (i.e. no consent has been revoked), the sum of all ToV to that HCP or HCO during the reporting period is disclosed under their name.

If the HCP (and HCOs who are individuals, as the case may be) revoke earlier provided consent, the report is updated within 14 days. In particular, if the consent on disclosure is not provided to Pfizer Belarus, 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, but as part of the sum of all the ToV which cannot rely on any of the legal basis (for example, if based on consent, regarding any HCP or HCO who did not provide consent -or later revoked it- to the disclosure of at least one transfer of value) during the reporting period.

Over-the-counter medicines (OTC): OTC medicines are out of scope for this report.

ToV from Pfizer legal entities in other countries (cross border ToV): This report includes ToV to HCPs and HCOs who are residents of Belarus. This includes all ToV (direct and indirect) made by any Pfizer affiliates in the 33 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.

In future disclosures, we will continue the journey to transparency including the continued improvement of our cross borders process.

Currency: ToV are reported in BYN. ToV made in a different currency were converted to BYN when this report was created. The Pfizer standard exchange rates for the ToV day of payment were applied.

Value Added Tax (VAT): Transfers of value are reported as gross amount (with VAT if applicable).

Valuation of in kind donations: Disclosed values of in kind donations are reported as gross amount (with VAT if applicable).

Country Unique Identifier: HCOs are disclosed with Legal Entity's Code. Country unique identifiers for HCPs are not indicated in this report.

Self-Incorporated HCP: In case of value transferred to self-incorporated HCP's company disclosure will be made on HCO level through which one or more HCPs provide services.