

**Pfizer 2020**

**Disclosure Code Transparency  
Report**

**Methodological Note**

**Pfizer Ukraine**

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## 1. Introduction

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 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> or <http://www.aprad.org.ua>

Here in Ukraine disclosure of ToV made to HCPs and HCOs during 2019 will be available on [www.pfizer.ua](http://www.pfizer.ua) for 3 years, until June 30<sup>th</sup>, 2023.

This report discloses all the ToV made to Health Care Professionals (HCPs) and Health Care Organisations (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 Ukraine.

## 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"> <li>• Charitable contributions</li> <li>• Business Donations</li> <li>• Educational grants (e.g. fellowships, courses provided by a HCO where Pfizer does not select the individual HCPs participating)</li> <li>• Sponsoring of speakers/faculty which by nature of purpose and funding are classified under educational grants</li> </ul>
Contribution to Cost of Events	Sponsorship agreements (HCOs only)	<ul style="list-style-type: none"> <li>• Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program</li> <li>• Funding an event in return for a display booth</li> <li>• Funding an event in exchange for advertising space</li> <li>• Other advertisement space (in paper, electronic or other format)</li> <li>• Satellite symposia at a congress</li> <li>• If part of a package: Name badges, drinks, meals etc. provided by the organizers (included in the sponsorship agreement)</li> <li>• Any other activity qualified as “Corporate Sponsorship” according to Pfizer’s Anti-Corruption Policies</li> <li>• Sponsoring of speaker/faculty and sponsoring courses provided by an HCO which are qualified as “Corporate Sponsorship” according Pfizer’s Anti-Corruption Policies</li> <li>• For contributions provided to Events through Professional Conference Organisers(PCOs): ToVs through PCOs are reported as follows:               <ul style="list-style-type: none"> <li>either in the name of benefitting HCO</li> <li>or in the name of Recipient PCO</li> </ul> </li> </ul>

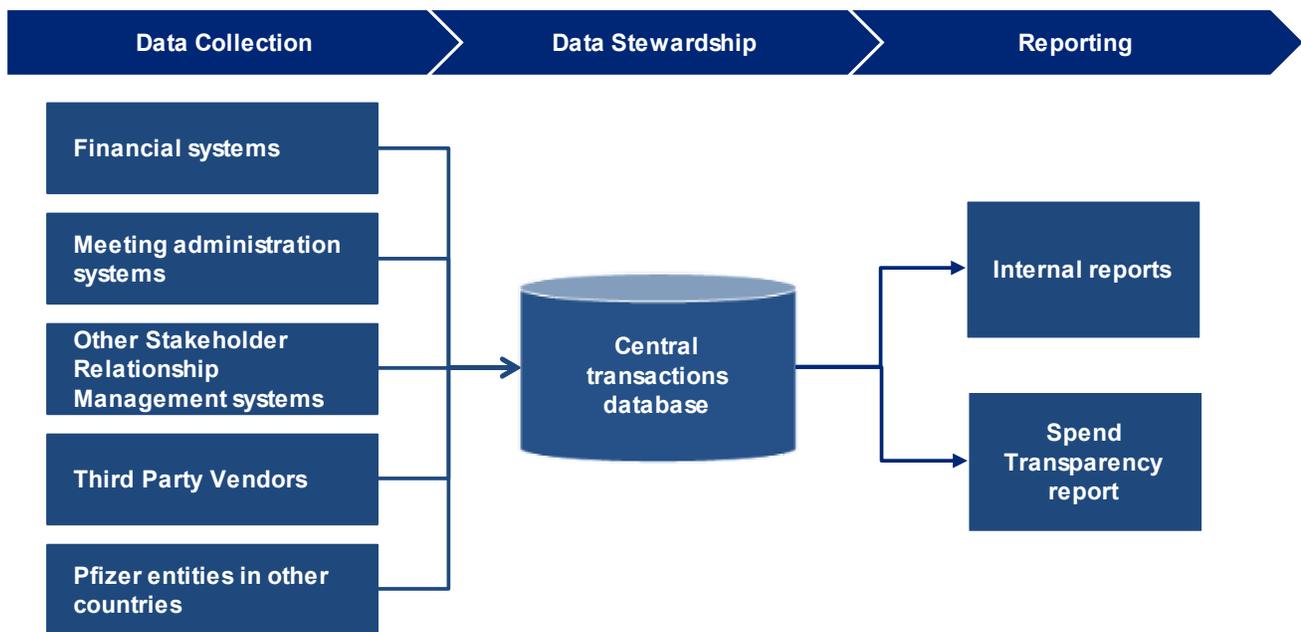
	Registration fees	<ul style="list-style-type: none"> <li>• Fees paid for the HCP/HCO to attend events not organised by Pfizer</li> </ul>
	Travel & Accommodation	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Visa</li> <li>• 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).</li> </ul>
Fee for services and consultancy	Fees	<ul style="list-style-type: none"> <li>• Speaker engagements</li> <li>• Advisory Boards*</li> <li>• Study-related engagements</li> <li>• Preceptorships</li> <li>• Post-marketing surveillance studies</li> <li>• Non-Interventional Studies that are Retrospective in nature</li> <li>• Medical writing</li> <li>• Data analysis</li> <li>• Development of education materials</li> <li>• General consulting / advising</li> <li>• Speaker training if linked to a speaker engagement</li> <li>• Any other activity which qualifies as General Consultancy according to Pfizer's Anti-Corruption Policies</li> </ul>
	Related expenses	<ul style="list-style-type: none"> <li>• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking)</li> <li>• Accommodation</li> <li>• Visa</li> <li>• 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).</li> </ul>
Research and Development Transfers of Value	n/a	<ul style="list-style-type: none"> <li>• Clinical Trials</li> <li>• Data Monitoring Committees related to studies</li> <li>• Non-Interventional Studies that are Prospective in nature</li> </ul>

		<ul style="list-style-type: none"><li>• Investigators Initiated Research (IIR)</li><li>• Clinical &amp; Research Collaboration</li></ul>
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\* 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:** means any member of the regulatory authorities, medical, dental, pharmacy or nursing professions or any other person who in the course of his or her professional activities may prescribe, recommend, purchase, supply, or administer a pharmaceutical product.

**Definition of HCO:** means any legal person irrespective of the legal or organizational form or its separate unit, aiming at health care of patients and/or provision of medical services to the public based on appropriate licenses and professional activities of medical (pharmaceutical) workers. In addition, HCO includes: medical or scientific associations, learned society (except for patient associations), medical teaching institutions, healthcare foundations and other medical institution whose business address, place of incorporation or primary place of operation is in Europe.

**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 (Pfizer Ukraine system clearing date)

Indirect ToV: reporting date is the date of the event (last day of the event in case of multi-days 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.

**Consent from HCPs/HCOs to disclose transfers of value:** Pfizer asks HCPs and HCOs whether they consent to the disclosure of the transfers of value made to them. We do our best effort to advocate for transparency.

If the HCP consents to disclosure, the sum of all transfers of value to that HCP during the reporting period is disclosed under their name. If the HCP does not provide consent to disclosure, all the transfers of value in the reporting period are reported in the "aggregate" section of the report. This means that the transfer of value is not disclosed under the name of the HCP, but as part of the sum of all the transfers of value to any HCP who did not provide consent during the reporting period.

Consent to disclosure is part of the contract with HCO. If HCO does not provide consent to disclosure, it means that HCO does not sign contract and Pfizer does not provide transfer of value to HCO. Consent once provided by HCP can also be revoked. If so, the report is updated as soon as possible.

**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 Ukraine. 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:** Transfers of value are reported in Ukrainian Hryvna (UAH). Transfers of value made in a different currency were converted to Ukrainian Hryvna (UAH) when this report was created. The Pfizer standard exchange rates for the transfer of value day of payment were applied.

**Value Added Tax (VAT):** Treatment of VAT and other taxes depends on the transfer of value. All applicable amounts, including taxes, paid by Pfizer to HCP or HCO are disclosed in this report. All relevant amounts of taxes paid by Pfizer to state budget (of all levels) of Ukraine, related to transfer of value to HCP or HCO are out of scope of this report.

**Valuation of in kind donations:** Value of donation in kind is defined as the cost Pfizer paid for donated commodities, if they have been purchased in Ukraine, or the customs value, if they were imported to Ukraine.

**Country Unique Identifier:**

- For HCPs it is unique ID created by Pfizer
- For HCOs it is unique ID of entity in the United State Register of Legal Entities and Individuals Entrepreneurs of Ukraine (EDRPOU Code)