

Pfizer 2016

**Disclosure Code Transparency
Report**

Methodological Note

Pfizer Ireland

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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.

As the primary point of contact with patients, healthcare professionals offer invaluable and expert knowledge on patient outcomes and management of diseases.

Sharing information and best practice on state-of-the-art treatments plays a crucial role in informing the pharmaceutical industry's efforts to improve patient care, treatment options and patient outcomes.

Prescription medicines developed by the industry are complex products designed to address the needs of patients. The pharmaceutical industry has a special duty to ensure that healthcare professionals are kept constantly in touch with continuing developments in the pharmaceutical field. Indeed, educating healthcare professionals about the medicines and the diseases that they treat benefits patients. Accordingly, meetings and events may be organised between the industry and the professions for the further exchange of ideas and information. In addition, the custom has grown of the industry supporting independent meetings of healthcare professionals intended to update and expand the continuing education of the professions themselves. Many of these meetings could not take place without the support and assistance of the pharmaceutical industry. Companies may legitimately provide assistance that is directly related to the bona fide continuing education of the healthcare professionals and which genuinely facilitates attendance of the healthcare professional for the duration of the educational aspect of the event.

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

Here in Ireland disclosure of payments made to HCPs and HCOs during 2016, will be available by 30th June, 2017 on www.pfizer.ie and www.transferofvalue.ie

This report discloses all the transfers of value made to Health Care Professionals (HCPs) and Health Care Organisations (HCOs) in 2016. 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 transfers of value disclosed in this report cover all the payments made by Pfizer to HCPs and HCOs resident in Ireland.

2. Pfizer activities per EFPIA category

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

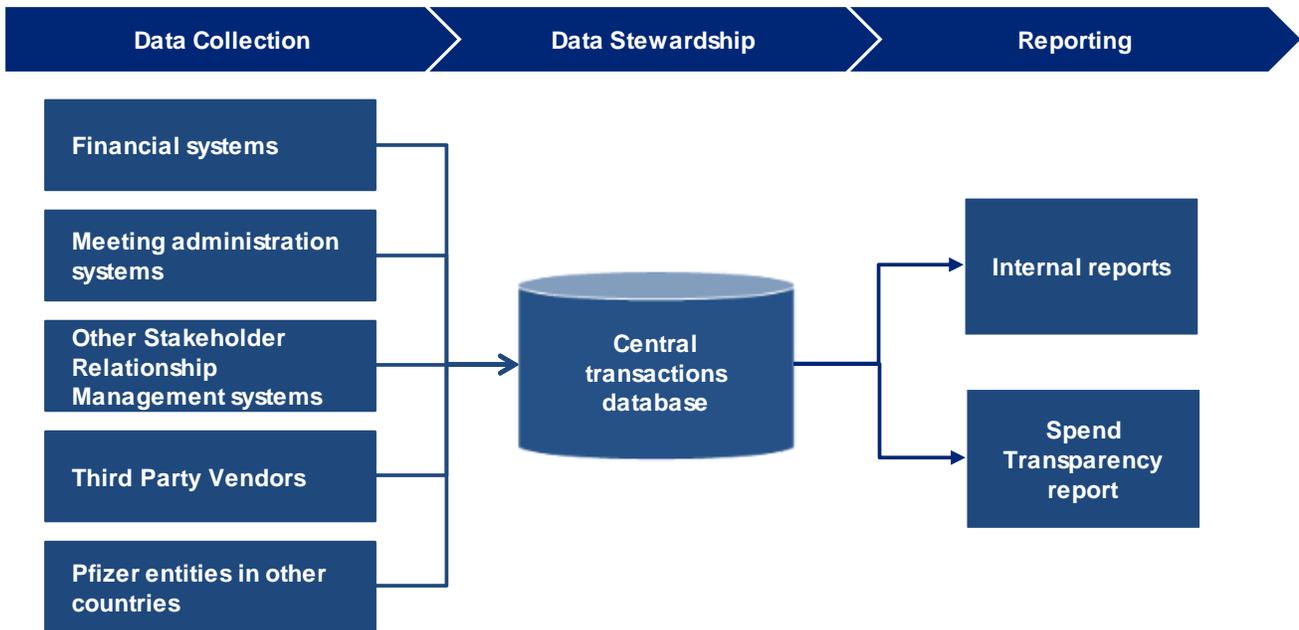
| EFPIA category | EFPIA subcategory | Activities |
|----------------------------------|------------------------------------|---|
| Donations and Grants (HCOs only) | n/a | <ul style="list-style-type: none"> • Charitable contributions • Business Donations • Educational grants (e.g. fellowships, courses provided by a HCO where the 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 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 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 |
| | Registration fees | <ul style="list-style-type: none"> • Fees paid for the HCP/HCO to attend events not organised by Pfizer |
| | Travel & Accommodation | <ul style="list-style-type: none"> • Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation |

| | | |
|---|------------------|--|
| | | <ul style="list-style-type: none"> • 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 • 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 • 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 transfers of value 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 transfers of value 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

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

Definition of Transfer of Value: Direct and indirect transfers of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development and sale of prescription-only medicinal products exclusively for human use. Direct transfers of value are those made directly by a company for the benefit of a recipient. Indirect transfers of value are those made on behalf of a company for the benefit of a recipient, where the identity of such company is known to, or can be identified, by the recipient.

Definition of HCP:

The term “healthcare professional” means a person of any of the following classes:

- (i) Registered medical practitioners
- (ii) Registered dentists
- (iii) Registered pharmacists
- (iv) Registered nurses

Definition of HCO: The term “healthcare organization” means any healthcare, medical or scientific association or organization (irrespective of the legal or organisational form) such as a hospital, clinic, foundation, university or other teaching institution or learned society (except for patient associations within the scope of Annex III of the IPHA Code) whose business address, place of incorporation or primary place of operation is in Europe or (ii) through which one or more healthcare professionals provide services.

Out of scope Transfers of Value to HCPs: Any employee of Pfizer Healthcare Ireland who is also qualified as a Healthcare Professional is out of scope for this report if they are employed full time by Pfizer.

Out of scope Transfers of Value to HCOs: Contracts for services with HCOs to provide occupational health services to our employees or assistance to patients already receiving treatment do not fall within the definition of Transfer of Value and as such are not captured in the ToV Report.

Timing of transfers of value: This report discloses all transfers of value whose transaction date falls within the year 2016. 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.

Transfer of Value date: the dates to be considered for disclosure are:

Direct ToV: payment date as per SAP system clearing date

Indirect ToV:

StarCite countries: Reporting date is the date of the event (last day of the event in case of multi-days event)

Transfer of Value 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 transfer of value is captured and disclosed in the corresponding reporting period.

Consent from HCPs to disclose transfers of value: Pfizer asks HCPs whether they consent to the disclosure of the transfers of value made to them. We do our best effort to advocate for transparency and convince HCP to provide their consent. 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 there is a transfer of value that the HCP has not provided consent for, 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 to the disclosure of at least one transfer of value during the reporting period.

- For 2016 cross border transfer of values, we have endeavoured to collect consent and where not possible, we disclose them in the “aggregate” section of the document

Consent once provided can also be revoked. If so, the report is updated within 20 working days of receipt of revocation.

Since HCOs according to the above definition are a legal entity, Pfizer does not need to collect consent from HCOs, however the right to disclose is included in our funding confirmation agreements with HCOs.

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

Items of medical utility, meals and drinks or samples: Due to existing controls and Code provisions already in place, items of medical utility, meals and drinks or samples do not fall within the scope of the disclosure obligation.

Transactions part of ordinary course of purchase/sales: Transactions that are part of ordinary course purchases and sales of medicinal products by and between a company and a healthcare professional or a healthcare organisation do not fall within the scope of the disclosure obligation.

Transfers of value from Pfizer legal entities in other countries (cross border transfers of value):

This report includes transfers of value to HCPs and HCOs who are residents of Ireland. This includes all transfers of value (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 make reasonable effort to collect and disclose direct payments 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 Euro. Transfers of value made in a different currency were converted to Euro 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 depends on the transfer of value:

| Scenario | Reported as |
|----------------------|--|
| Events and meetings | Including VAT |
| Fees for Consultancy | Including VAT (charged at zero per cent) |

Valuation of in kind donations: The transactional value of the equipment is the relevant value and is supported by quotation or invoice from the requesting HCO.

Country Unique Identifier: We do not include a Country unique identifier as there is no uniform or consistent identifier for all HCPs and HCOs in our market.

Self-Incorporated HCP: Self Incorporated HCP is, by definition, a Healthcare Organisation. If payment made through an HCO, we don't disclose at individual level. If payment is made to an individual HCP, we shall disclose at individual HCP level.