Pfizer 2020
Disclosure Code Transparency Report

Methodological Note

Pfizer Russia

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1. Introduction

We regularly work with healthcare professionals (HCPs) and healthcare organizations (HCOs) and Patient Organizations (POs) 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, HCOs and POs. 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) and the Association of International Pharmaceutical Manufacturers (AIPM) 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 www.aipm.ru.

Here in Russia disclosure of ToV made to HCPs and HCOs and POs during 2019 will be available on www.pfizer.ru as 30th of June.

This report discloses all the ToV made to Health Care Professionals (HCPs) and Health Care Organisations (HCOs) in 2019. POs will be disclosed as separate list. 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 and POs resident in Russia.

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 and PO)	n/a	• 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 and PO)	• 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 in the name of benefitting HCO

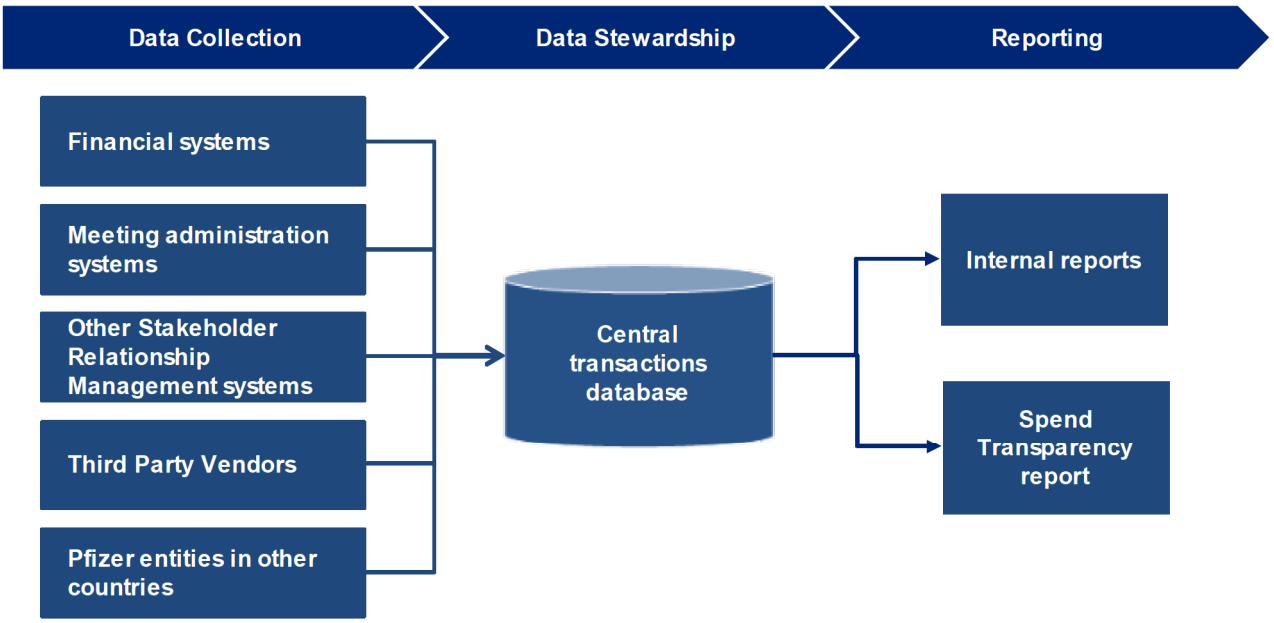
	Registration fees	• Fees paid for the HCP/HCO to attend events not organized by Pfizer
	Travel & Accommodation	• Travel (e.g. flight, train, taxi, car hires, tolls, mileage reimbursement, parking) • Accommodation • Visa • Health Insurance linked to travel requirement [ONLY in case the following expenses 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 (HCOs band POs)	• 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 • 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	• 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.

Below are the definitions which are taken from the Code of Marketing Practices of the Association of International Pharmaceutical Manufacturers (hereinafter - «AIPM Code").

Healthcare professionals - doctors and other medical professionals, heads of medical organizations, pharmaceutical professionals, including pharmacists, heads of pharmacy organizations, and other specialists the professional activity of which is concerned with pharmaceutical products and who in the process of their professional activity have the right to prescribe, recommend, purchase, supply, or administer pharmaceutical products.

Healthcare Organization (for the purposes of Chapter VII of AIPM Code) - any legal entity that is (i) healthcare, medical, pharmaceutical or scientific association or organization (regardless of its organizational and legal form), such as a hospital, clinic, foundation, university or other teaching institution (except for patient organizations), whose business address, place of incorporation or primary place of operation is in Russia, or (ii) which provides services through one or more healthcare professionals.

Patient organization - a non-commercial organization representing the interests and needs of patients, their families, and/or persons taking care of patients and/or disabled persons;

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 (SAP 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.

Legal basis for disclosure (to disclose ToV regarding individuals):

Information for each transfer of values is disclosed on an individual basis in compliance with the Federal law "On personal data". The disclosure of information is made on an individual basis for each

identifiable recipient. The size of the transferred values to identifiable recipient related to one of the categories is contained in section 2 of the present Methodological note.

Disclosures about values' transfer to Healthcare Professionals

Due to the fact that Russian law prohibits the disclosure of any information related to an individual without his explicit consent, Pfizer has collected the relevant consent of Healthcare Professionals with the aim of obtaining the permission for disclosure about transfer of values made in their favor, on an individual basis.

In case the Healthcare Professional has provided his consent to disclose the data of values transferred, full information about such transfers completed during the reporting period, will be disclosed on an individual basis with the name of the Healthcare Professional.

If the Healthcare professional has not provided his consent to disclose the data of values transferred all values transfers, completed during the reporting period will be disclosed in aggregate way. This means that the data about Values Transferred will not be disclosed in respect of a particular Healthcare professional but will be included as a part of the total amount of transferred values to all the Health Professionals, who have not provided their consent to the disclose the data in respect of at least one of value transferred within the reporting period.

The consent form provided by the respective HCP can be withdrawn by such HCP at any time. In this case, the report shall be corrected once the withdrawal of the consent is provided to Pfizer, but not later than within 30 (thirty) working days after its receipt.
Disclosures about values transferred to Healthcare Organizations (HCO)

Disclosure about values transferred to HCOs and POs is on an individual basis.

The transfer of values can be both direct and indirect. For example, the costs related to meeting organization can be transferred to a third party, the technical provider (indirect transfer of values to HCO).

The contract signed by the parties is documentary acknowledgement of direct values transferred to HCO and /or PO. The presence of the letter-request of HCO/PO to the company about the implementation of the appropriate support is the documentary acknowledgement of the indirect values transfer to HCO/PO.

In any case, disclosure of values' transfer to HCO/PO is based on the actual documented circumstances when a company knows or can identify the HCO/PO which is the beneficiary, i.e. obtains the benefit as a result of this values transferred.

In order to ensure compliance to law requirements to privacy data collection and processing, each HCO – recipient of funding should be requested to sign a Funding Confirmation Letter containing disclosure provisions or the contract should have Disclosure clause with provisions before transfer of value. Funding Confirmation Letter shall be signed by authorized persons on behalf of Pfizer and of the relevant HCO.

However, considering the lack of a direct contract with HCO in the case of indirect values transferred, the company separately pays attention to the following:

The amount specified in the appropriate columns of the table for disclosure of information does not always mean the transfer of monetary assets in the size of specified account directly to HCO, in particular, can be transferred to the Third parties (technical providers), involved by HCOs, for example, to organize a meeting.

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 the Russian Federation. 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 rubles of the Russian Federation. ToV made in a different currency were converted to rubles when this report was created. The Pfizer standard exchange rates for the ToV day of payment were applied.

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

Scenario	Reported as...
Sponsorship of HCP	with VAT
Remuneration of HCP for services	without VAT
Direct values transfer to HCO	without VAT
Indirect values transfer to HCO	with VAT
Patients Organization	without VAT

Valuation of in kind donations:

The date of values' transfer: data of obtaining of in kind donation (for example, waybill) or date of payment in case of monetary donation provision.

The cost of in kind donation is specified in Donation Contract

Country Unique Identifier

For the HCPs it is unique ID created by Pfizer

For the HCOs it is unique ID of entity – Taxpayer Personal Identification Number (INN)

Self-Incorporated HCP: not applicable