

Pfizer 2016

Report on data disclosure

Methodological note

Pfizer Russia

1. INTRODUCTION	ERROR! BOOKMARK NOT DEFINED.
2. PFIZER COMPANY OPERATIONS IN ACCORDANCE WITH EFPIA.....	4
3. INFORMATION SOURCES.....	6
4. DEFINITION OF VALUES' TRANSFER	7

1. Introduction

Pfizer Company negotiates with healthcare professionals (HCP) and healthcare organizations (HCO) on regular basis, including next questions: research programs, doctor's professional development, socio-demographic projects. These relations have a significant meaning for healthcare professionals to obtain actual information, which is necessary for choice of the therapy in order to improve patients' health and to exchange of information, which might be relevant to clinical decision-making.

In order to enhance transparency of interaction in favor of patients Pfizer is aimed to have clear and open business and relationships with healthcare professionals and healthcare organizations. We hope that provision of information about the relationship with healthcare professionals and healthcare organizations can explain how these relations have an important meaning for emergence of highly innovative medicines and treatments that allow increasing the life expectancy of patients and improving the quality of life.

Pfizer Company believes that transparency of relationships has a crucial meaning for building and maintaining the trust to our company, the confidence in our products. Confirming the commitment to the highest ethical standards, the Pfizer company, as a member of EFPIA, and the Association of International Pharmaceutical Manufacturers (AIPM), fully shares the position of EFPIA that the initiative to disclose the information about payments will contribute to enhance mutual responsibility and ethics interaction between the pharmaceutical industry and the medical community and ultimately, will serve the interests of patients and the increase of mutual trust in the eyes of society

EFPIA requirements about information disclosure ensure general basis for reports about values transfer over all Europe. To obtain additional information about these requirements follow to the link below:

<http://transparency.efpia.eu> or www.aipm.ru.

Present report on the data disclosure (hereinafter - the Report) contains all cases of values transfer in favor of healthcare professionals (HCP) and healthcare organizations (HCO) in 2016. Present methodological notes represent some of the crucial aspects of how the values transfers are divided into categories, and in what format they will be disclosed.

2. PFIZER COMPANY OPERATIONS IN ACCORDANCE WITH EFPIA.

The following below table it is indicated which activities belong to the categories and sub-categories that are determined by the rules of EFPIA.

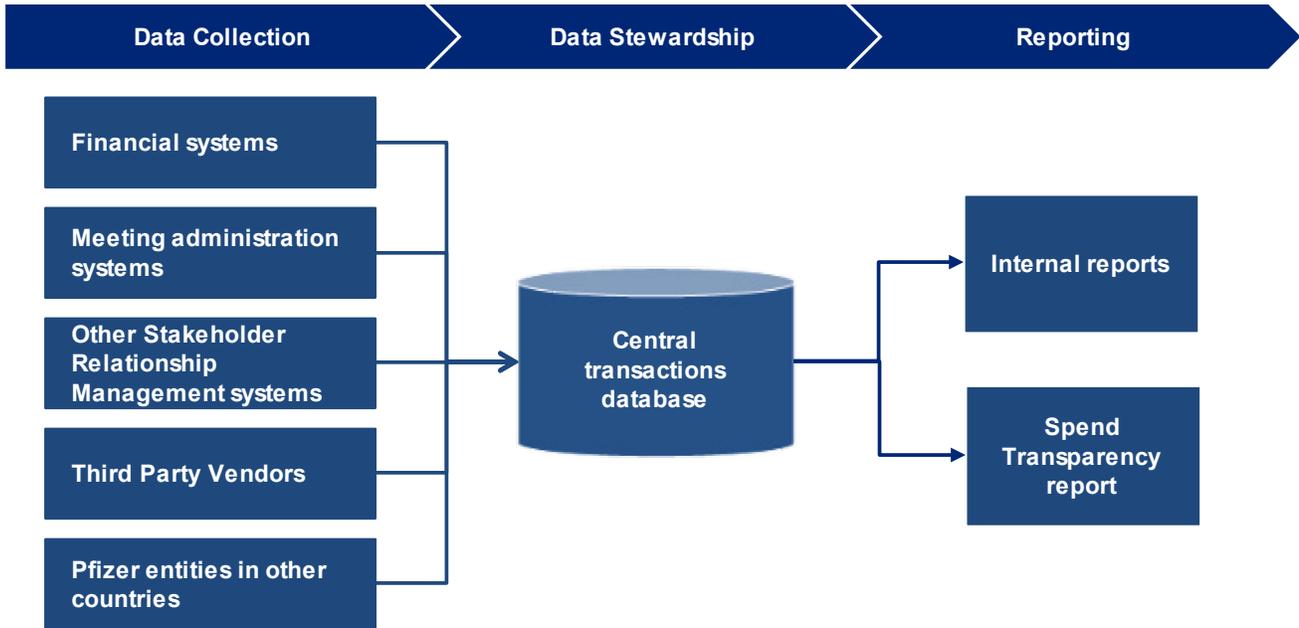
EFPIA categories	EFPIA sub-categories	Operations
Donations and grants (only HCO)	Monetary or in kind donations Educational Grants	<ul style="list-style-type: none"> Charitable contribution Business Donation Educational Grants (for instance, maintenance allowance, educational courses, provided by healthcare organizations when Pfizer Company does not choose health care professionals for participation. <ul style="list-style-type: none"> Lecture's sponsorship according to its purpose and order of grant is defined as an educational grant
Cover of expenses within meetings organization	Sponsor agreements with healthcare organizations or Third Parties involved by healthcare organization with purpose of meeting	<ul style="list-style-type: none"> Placement of a brand logo in a conference program or invitation communication in exchange for supporting the program Provision of a financial support in exchange for the possibility of organizing an exhibition stand Provision of a financial support in exchange for advertising space <p>Another advertising space (paper, electronic or another format)</p> <p>Satellite symposiums in a meeting</p> <ul style="list-style-type: none"> Part of sponsor package: badges, beverage, meal and etc., provided by meeting hosts, included in sponsor agreement Any other activity qualified as Corporate Sponsorship in accordance with Pfizer anticorruption policy Sponsorship of lecture and educational courses provided by healthcare organization which are determined as Corporate sponsorship accordingly to Pfizer Company anticorruption policy
	Registration fee	<ul style="list-style-type: none"> Registration fee for participation of healthcare professionals and healthcare organizations in the

		meetings not hosted by
	Travel and accommodation	<ul style="list-style-type: none"> • Travel (for example, flight, train, taxi expenses) • Accommodation • Visa • Medical insurance, related to the travel requirements [only if health/life insurance is required to obtain a visa]
Payment for services and consultancy	Remuneration	<ul style="list-style-type: none"> • Engagement of lecturer • Advisory board* • Activity, related with researches • Preceptorship • Post-marketing monitoring • Scientific article writing • Data analysis • Training materials development • Consultancy • Any other activity, that is qualified as consultancy in accordance with anticorruption policy of Pfizer company
	Related expenses	<ul style="list-style-type: none"> • Travel (for example, flight, train, taxi expenses) • Accommodation • Visa • Medical insurance related to the travel requirements
Value transfer within trials and developments conduction	Not applicable	<ul style="list-style-type: none"> • Clinical trials • Data analysis committees related to the researches • Observational researches • Investigator's initiated researches (IIR) • Collaboration in a field of clinical trials and developments

* Excluding data analysis committees related to the researches that are disclosed in conjunction with R&D.

3. Information sources

Data about transfer of values that are disclosed in current Report are taken from diverse Pfizer systems. Below is general overview of collection and provision of data.



Information about values' transfer is collected from internal and external data sources and systems and then transmitted to a central database, where the data are checked and processed. Reports for disclosure of information are generated from database.

4. Definition of values' transfer

The keys of the definition of "transfer values" are discussed in this section.

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 workers, including pharmacists, managers of pharmacies, and other specialists, that have the field of professional activity with pharmaceutical products and that have the right to prescribe, recommend, purchase, dispense or use pharmaceutical products during their professional activity

Healthcare Organization (for the purposes of Chapter VII of AIPM Code) - any legal entity that is (i) Healthcare Organization, medical, pharmaceutical or scientific association or organization (regardless of its organizational and legal form), for example, hospital, clinic, foundation, university or other (except for patient organizations), whose registered office, place of registration of the legal entity or other place of business is within the Russian Federation, or (ii) that provide services by one or more healthcare professionals.

Values' transfer (for the purposes of Chapter VII of the AIPM code) - direct or indirect values' transfer, implemented in the form of monetary assets, in kind or in any other form and aimed as the promotion of a pharmaceutical product on the market as any other purposes in relation to the development and selling exclusively prescribed medicines for medical use. Direct transfer of values is provided by the pharmaceutical company directly for the benefit of the recipient. Indirect transfer of values is provided on behalf of a pharmaceutical company for benefit of the recipient or the intermediary in case of the pharmaceutical company knows or can identify the healthcare organization/healthcare professional, in favor of which the transfer of values is made .

Reporting period: all cases of values' transfer are disclosed in current Report, if the appropriate transfer of values happened during the two thousand sixteen (2016). In the financial system the date of value's transfer is determined as the end date of the transaction. Regarding the events the last day of the event is considered such a date.

Date of values' transfer: dates to be disclosed:

Direct transfer of values: payment date / end date of transaction indicated in the financial system

Indirect transfer of values: reporting date is the date of the event (in the case that the duration of the event exceeds one day, the reporting date will be the last date of the event)

The transfer of values in the case of partial participation or cancellation of the event:

- Fines for cancellation of the event are not included in the Report
- If healthcare professional partly participates in the event, the data are disclosed

Agreement with duration more than one year: if the term of the agreement is longer than one year, each transfer of values is recorded separately, and information about it is disclosed in the report for the current period.

Except the cases provided in the code of AIPM, information for each transfer of values is disclosed on an individual basis in accordance with 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 relating to an individual without his explicit consent, Pfizer has been 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' transfer, full information about such transfers completed during the reporting period, will be made 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' transfer all values transfers, completed during the reporting period will be disclosed in aggregate way. This means that the data about Values Transfer 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 transfer within the reporting period.

The consent form provided to HCP, can be withdrawn at any time. In this case, the report is to be corrected at once the notification of withdrawal of consent is given, but not later than within 30 (thirty) working days.

Disclosures about values' transfer to Healthcare Organizations (HCO)

Disclosure about values' transfer to HCO is on an individual basis.

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

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

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

However, considering the lack of a direct contract with HCO in the case of indirect values transfer, 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.

OTC products (OTC): OTC are not under the requirements of the information disclosure and are not included into the Report .

The transfer of values by legal entities that belong to the Pfizer group company and that are located in other countries (cross-border transfer of values): the Report contains the information on the transfer of values of HCPs and HCOs, who are residents of the Russian Federation. The report includes the information about the transfer of values, direct and indirect, performed by all divisions of Pfizer in 33 European countries in which there are rules on disclosure of transfer of values within EFPIA. In countries where the EFPIA requirements are not applied, Pfizer will make all efforts for the collection and disclosure of all direct transfers, committed by units of the company.

We aim to maximize transparency and will continue to work on improving processes to collect the information about cross-border transfer of values.

Currency: the Size of the transferred values specified in the report, shall be determined in rubles of the Russian Federation. The Transfers of Values committed in other currencies are converted into rubles when a Report on the internal exchange rate used by the company is created.

The value added tax (VAT): specification the size of the transferred values with or without VAT depends on the type of expenses:

Expense	With/Without VAT
Sponsorship of HCO	with VAT
Remuneration of HCO for services	without VAT
Direct values transfer to HCO	without VAT
indirect values transfer to HCO	with VAT

Estimation of monetary and in kind donation.

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 and